Attachment 4 – Transportation Technical Memorandum

Gibson transportation consulting, inc.

TECHNICAL MEMORANDUM

TO: Robin Ijams, CEP (CDM Smith)

FROM: Jonathan Chambers, P.E.

DATE: December 4, 2024

RE: CEQA Evaluation of Design Modifications to the Airfield and Terminal Modernization Project
Los Angeles International Airport **Ref**: J2136a

This technical memorandum summarizes the analysis of the transportation impacts of the proposed modified Airfield and Terminal Modernization Project roadway improvements (Modified ATMP Roadway Improvements) at Los Angeles International Airport (LAX) as compared to the transportation impacts of the Approved ATMP Roadway Improvements analyzed in Section 4.8 of the *Los Angeles International Airport Airfield and Terminal Modernization Project Draft Environmental Impact Report* (October 2020)[1] (ATMP EIR). The ATMP EIR assessed transportation impacts in accordance with the California Environmental Quality Act (CEQA), based on the requirements set forth in the City of *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines* (July 2019)[2] (TAG), as coordinated with LADOT. Section 2 of the TAG identifies the following four types of transportation impacts to be addressed in a CEQA analysis:

1. Conflict with programs, plans, ordinances, or policies
2. Cause substantial vehicle miles traveled (VMT)
3. Induce substantially additional automobile travel
4. Substantially increase hazards due to a geometric design feature or incompatible use

While the TAG provides specific analysis guidance and thresholds of significance that focus on traditional residential, office, and retail developments, it also recognizes that some projects will not fit into these development categories. In such cases, and with the concurrence of LADOT, a customized approach can be used, which was the case for the ATMP EIR analysis, particularly as related to VMT impacts. The unique characteristics of VMT associated with vehicle travel at LAX, a large international airport that operates 24 hours a day every day of the year, were addressed in the ATMP EIR in terms of passenger VMT, employee VMT, and potential induced VMT associated with the proposed addition of new roadways. Additionally, the VMT analysis in the ATMP EIR accounted for the fact that the ground transportation system that would be in place when the ATMP is developed and operational in 2028 would be

[1] *Los Angeles International Airport Airfield and Terminal Modernization Project Final Environmental Impact Report* was subsequently certified in August 2021.
[2] These guidelines were subsequently updated in July 2022. However, none of the updates affect the analyses conducted for the ATMP.

substantially different than the existing conditions in year 2019 when the ATMP EIR impacts analysis was prepared. The change in future transportation characteristics at LAX would be attributable to the completion of the LAX Landside Access Modernization Program (LAMP), which includes an Automated People Mover (APM), a Consolidated Rental Car Facility (CONRAC), Intermodal Transportation Facilities (ITF) (East and West), and various roadway modifications. As such, a Projected Future Conditions Baseline for year 2028 was used in the evaluation of ATMP impacts. The following thresholds of significance were used in the ATMP EIR for evaluating transportation impacts:

Threshold 4.8-1 *Conflict with a program, plan, ordinance, or policy addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities) that was adopted to protect the environment.*

Threshold 4.8-2 *Generate VMT per employee exceeding 15 percent below the Projected Future Conditions Baseline (2028) VMT per employee. This threshold only applies to VMT associated with commute trips by workers employed at LAX. The Projected Future Conditions Baseline (2028) VMT per employee is 24.0. Therefore, the threshold for VMT per employee is 20.4.*

Threshold 4.8-3 *Increase total passenger VMT over the Projected Future Conditions Baseline (2028). This threshold only applies to VMT generated by passengers at LAX.*

Threshold 4.8-4 *Induce substantial additional VMT compared to the Projected Future Conditions Baseline (2028).*

Threshold 4.8-5 *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses.*

Both the CEQA transportation impacts analysis approach for the ATMP and the VMT impact thresholds of significance specific to the ATMP were coordinated with, and approved by, LADOT, as presented in Section 4.8 of the ATMP EIR.

PROJECT DESCRIPTION

The Approved ATMP Roadway Improvements would modernize vehicular access to LAX in order to reduce congestion on non-airport streets (especially Sepulveda Boulevard and Century Boulevard). The Approved ATMP also includes development of a new Concourse 0 and Terminal 9 to expand airport operations, as well as landside improvements to the ramps connecting the local street network to the Central Terminal Area (CTA).

The proposed Modified ATMP Roadway Improvements, shown in Figure 1, are the result of the detailed engineering design and planning that has been undertaken since the 2021 certification of the ATMP EIR and approval of the Approved ATMP Roadway Improvements. The key proposed changes include:

1. Realignment of the inbound ramp from southbound Sepulveda Boulevard
2. Realignment and reconfiguration of the ramp system east of Sepulveda Boulevard between 96th Street and 98th Street
3. Elimination of the proposed traffic signal at Sepulveda Boulevard & 96th Street
4. Removal of the pedestrian sidewalk on the west side of Sepulveda Boulevard between Lincoln Boulevard and Century Boulevard[3]
5. Grade separation of pedestrian crossings of 96th Street at Sepulveda Boulevard and Sepulveda Boulevard at Century Boulevard (i.e., pedestrian bridges)
6. Installation of a multi-use pathway for pedestrians and bicycles along the north side of 96th Street between Sepulveda Boulevard and Jetway Boulevard
7. Modifications to Vicksburg Avenue access
8. Addition of drive aisles from Sepulveda Boulevard to 94th Street
9. Weaving improvements among the overpasses over Sepulveda Boulevard connecting to the CTA
10. Improvements and additions to airport return routes

CONFLICT WITH PROGRAMS, PLANS, ORDINANCES, OR POLICIES

The potential for the Modified ATMP Roadway Improvements to conflict with a program, plan, ordinance or policy which could result in a significant impact under Threshold 4.8-1 was reviewed. As shown in Section 4.8.5.1 of the ATMP EIR, the Approved ATMP Roadway Improvements would not conflict with a program, plan, ordinance, or policy addressing the circulation system and, thus, the Approved ATMP Roadway Improvements would have a less than significant impact.

The Modified ATMP Roadway Improvements would similarly not conflict with a program, plan, ordinance, or policy. Table 1 provides a summary of the Modified ATMP Roadway Improvements' similarities to, and differences from, the consistency discussion in Table 4.8-11 of the ATMP EIR. Table 2 provides modified responses to the guiding questions in Table 4.8-12 of the ATMP EIR. Based on the summary provided, the Modified ATMP Roadway Improvements would have a less than significant impact.

As noted above, the removal of the sidewalk on the west side of Sepulveda Boulevard between Lincoln Boulevard and Century Boulevard was not analyzed as part of the ATMP EIR. The removal of public pedestrian infrastructure has the potential to conflict with policies from the Los Angeles Mobility Plan 2035, Vision Zero, and the Los Angeles Citywide Design Guidelines. However, as described in Tables 1 and 2, the Modified ATMP Roadway Improvements would provide a safer alternative pedestrian route on the east side of Sepulveda Boulevard, which would be accessed via an existing at-grade signalized crossing of Sepulveda Boulevard at 92nd Street and the proposed grade-separated pedestrian bridges at 96th Street and Century Boulevard. The use of the east side of Sepulveda Boulevard for pedestrian travel would eliminate the need to use the existing at-grade signalized crossing of Lincoln Boulevard at Sepulveda Boulevard for most

[3] While the removal of this sidewalk was considered as part of the Approved ATMP Roadway Improvements, it was not assessed in the ATMP EIR. Therefore, the potential CEQA impacts of this feature are assessed herein as a changed condition under the Modified ATMP Roadway Improvements.

pedestrians.[4] Additionally, eliminating the sidewalk on the west side of Sepulveda Boulevard would remove the existing at-grade unsignalized pedestrian crossing of the CTA terminal access ramp from southbound Sepulveda Boulevard onto the 96th Street Bridge at Sky Way. These changes would improve safety for pedestrians in the Project area. The removal of the sidewalk would not reduce accessibility, as there are only airport transportation and terminal uses on the west side of Sepulveda Boulevard and they are not designed to be pedestrian-accessible from the street. Therefore, the sidewalk removal would not constitute a significant impact with respect to conflicting with any transportation-related program, plan, ordinance, or policy.

VMT ANALYSIS

As summarized in Table 3, the ATMP EIR considered four types of VMT, each with specific thresholds and conclusions regarding significance, based on the ATMP EIR's analysis of the Approved ATMP Roadway Improvements. As noted above and further explained in Section 4.8.2.2 of the ATMP EIR, the analysis of VMT used a Projected Future Conditions Baseline of 2028 that includes the developments of Phase 1 of the LAMP as the baseline against which impacts are measured. This is because, given the substantial ground system changes that would occur around LAX with completion of the LAMP improvements, the 2028 future conditions baseline is the only accurate way to disclose potential VMT impacts associated with the ATMP. Each of these VMT analyses was updated to reflect the changes with the proposed Modified ATMP Roadway Improvements.

Table 4 summarizes the changes in trip length associated with the key routes into and out of the CTA and to and from parking at the Intermodal Transportation Facility (ITF) West. As shown, the changes to the length of these routes are measured in fractions of a mile. These route lengths were used in the estimations of changes in VMT with the Modified ATMP Roadway Improvements.

Employee VMT

The analysis of VMT per employee under Threshold 4.8-2 was based specifically on the estimated 4,700 new employees that would work at Concourse 0 and Terminal 9. These employees were estimated to generate approximately 8,190 vehicle trips per day based on Table 4.8-7. As stated on page 4.8-39 of the ATMP EIR, these employees would park at Employee Lot South adjacent to the new ITF West, which is located east of Jetway Boulevard between Westchester Parkway and 96th Street.

Several routes to or from the ITF West would travel through the Modified ATMP Roadway Improvements system. Based on the change in travel length for such trips, the change in overall employee VMT and VMT per employee can be calculated. Table 5 summarizes the change in employee trip length for each route of approach and departure and applies the estimated employee distribution patterns to calculate VMT. As shown, the Modified ATMP Roadway Improvements are estimated to increase total employee VMT by 82 miles daily, which is less than 0.02 average miles per day per employee.

[4] Based on traffic counts collected in February 2019 for use in the Approved ATMP Roadway Improvements non-CEQA analysis for LADOT and online imagery from Google Streetview between January 2009 and May 2024, virtually all pedestrians who walk on the west side of Sepulveda Boulevard cross Lincoln Boulevard to continue north on Sepulveda Boulevard (or approach from that direction if traveling south) rather than walking west of Sepulveda Boulevard on Lincoln Boulevard.

The ATMP EIR determined that the VMT reduction strategies identified under Mitigation Measure MM-T (ATMP)-1 would reduce employee VMT by at least 16,450 daily VMT to reach the VMT significance threshold of 20.4 VMT per employee, to be ensured through annual monitoring. Meeting the employment VMT mitigation requirement for the Modified ATMP Roadway Improvements would require reducing employee VMT by an additional 82 miles per day (i.e., improving the effectiveness of Mitigation Measure MM-T (ATMP)-1 by an additional amount of less than 0.5%). Similar to the employee VMT impacts of the Approved ATMP Roadway Improvements, it is anticipated that LAWA can reduce the small increase in employee VMT from the Modified ATMP Roadway Improvements below the level of significance based on the strategies that are available for employment VMT and LAWA's ability to control, monitor, and report on the implementation of such strategies. This level of effectiveness can be ensured through the mechanisms already built into MM-T (ATMP)-1 (i.e., annual monitoring, and, if needed, adjustment of the VMT reduction strategies to increase effectiveness).

Therefore, the ATMP EIR's conclusion that the VMT per employee impact would be reduced to a less than significant level remains unchanged.

Passenger VMT

The analysis of passenger VMT under Threshold 4.8-3 was based on the total daily VMT traveling to the CTA as well as the ITF West and ITF East. Travel routes to and from the ITF East and the rental car center do not pass through the ATMP area, and travel routes to and from Terminal 9 would not change as a result of the Modified ATMP Roadway Improvements, so this analysis focused on trips to and from the CTA and the ITF West. Table 6 summarizes daily passenger vehicle trip generation by destination based on data from Table 4.8-8 of the ATMP EIR. As shown, the ATMP EIR estimated 167,787 trips to and from the CTA and 91,927 trips to and from the ITF West.

As with the employee VMT analysis described above, some of the routes to and from the ITF West would experience changes in trip lengths with the Modified ATMP Roadway Improvements. Additionally, all of the routes to and from the CTA would experience changes in trip lengths based on the data in Table 4. The ATMP EIR provided data on inbound and outbound traffic distribution percentages between the CTA and Sepulveda Boulevard north and south of Century Boulevard. These percentages were used, along with the trip generation estimates from Table 6, to determine how passenger VMT would be affected with the Modified ATMP Roadway Improvements.

Table 7 summarizes the change in passenger VMT with the Modified ATMP Roadway Improvements. As shown, the directional distribution percentages were applied to the daily trip generation estimates to determine how many trips would use each route into and out of the CTA and the ITF West. Those trip totals were then multiplied by the changes in trip lengths from Table 4 in order to calculate the total change in passenger VMT. As shown, the Modified ATMP Roadway Improvements would result in an increase of approximately 8,135 passenger VMT.

Table 8 summarizes overall passenger VMT with the Modified ATMP Roadway Improvements. As shown, the Approved ATMP Roadway Improvements would result in a net increase of 32,786 daily passenger VMT over the ATMP EIR's Projected Future Conditions Baseline in year 2028 of approximately 8.7 million daily passenger VMT, an increase of approximately 0.38%. With 8,135 additional VMT, the Modified ATMP Roadway Improvements would result in a net increase of approximately 40,921 daily passenger VMT, an increase of approximately 0.47% over the

Projected Future Conditions Baseline. Consistent with the conclusion in the ATMP EIR, this is a significant and unavoidable impact because it exceeds the future baseline passenger VMT. However, the increase in passenger VMT with the Modified ATMP Roadway Improvements as compared to the Approved ATMP Roadway Improvements is approximately 0.09% (i.e., a 0.47% increase over future baseline conditions compared to a 0.38% increase), which does not represent a substantial increase in the severity of the previously identified significant impact.

Short-Term Induced VMT

The ATMP EIR assessed the amount of short-term induced VMT based on the travel demand model built for the Project, which was based on the City of Los Angeles Citywide Model, in turn based on the Southern California Association of Governments 2016 Regional Transportation Plan model. As shown in Table 3, the Project model calculated that the Approved ATMP Roadway Improvements would cause a short-term increase of 3,306 daily VMT associated with non-airport trips.

Because non-airport trips generally would not travel on the new roadways proposed by the ATMP, induced VMT would be the result of changes to the number of trips and/or to the routes of trips on existing roadways, such as Sepulveda Boulevard and Century Boulevard. The ATMP does not increase capacity on these roads, but is designed to reduce airport-related congestion, which would attract more non-airport trips to these roads.

The only material changes from the Modified ATMP Roadway Improvements affecting existing public streets include the removal of the traffic signal at Sepulveda Boulevard & 96th Street and the installation of a pedestrian bridge over Sepulveda Boulevard at Century Boulevard, reducing or eliminating at-grade pedestrian crossings. Both of these changes would reduce delay and travel times on Sepulveda Boulevard.

A reduced travel time on Sepulveda Boulevard would be expected to cause an increase in traffic volume. Some of that increase would be drawn away from existing parallel routes such as I-405 to the east and Pershing Drive and Vista del Mar to the west. For most such shifts, it is likely that Sepulveda Boulevard provides a more direct route than the existing options,[5] and therefore these shifts would be associated with a small decrease in net VMT. However, some of the increase in traffic on Sepulveda Boulevard would likely be the result of new trips made possible by the reduced congestion, which would increase VMT.

Overall, the change in VMT associated with a reduced travel time on Sepulveda Boulevard is likely to be a small increase or decrease, lesser in magnitude than the ATMP EIR estimate of 3,306 daily VMT induced by the Approved ATMP Roadway Improvements. The ATMP EIR reports on page 4.8-58 that the Projected Future Conditions Baseline total regional VMT is over 283 million miles, and the short-term induced VMT represents a miniscule fraction of regional VMT. Nonetheless, just as the ATMP EIR concluded for the Approved ATMP Roadway Improvements, the Modified ATMP Roadway Improvements would result in a significant and unavoidable impact with respect to short-term induced VMT. However, the potential increase in induced VMT with the

[5] Pershing Drive and Vista del Mar are commonly used as alternatives to Sepulveda Boulevard for coastal travel between I-105 or Manhattan Beach to Marina del Rey, Venice, and Santa Monica. However, they require out-of-direction travel at the north end where they terminate at Culver Boulevard, increasing VMT compared to Sepulveda Boulevard. Similarly, depending on ultimate travel destination, I-405 can be less direct than Sepulveda Boulevard.

Modified ATMP Roadway Improvements compared to the increase that would occur under the Approved ATMP Roadway Improvements does not represent a substantial increase in the severity of the previously identified significant impact.

Long-Term Induced VMT

The ATMP EIR assessed long-term induced VMT based on the increase in lane miles associated with the Approved ATMP Roadway Improvements. It cited research that found that a 1.0% increase in roadway capacity (measured by lane miles) would result in a corresponding 1.03% increase in vehicle travel. This was a highly conservative approach, as the vast majority of the lane miles of roads proposed under the ATMP (both the Approved ATMP Roadway Improvements and the Modified ATMP Roadway Improvements) exclusively serve airport functions and would not be used by non-airport traffic. The ATMP EIR found that the Approved ATMP Roadway Improvements would construct 5.8 lane miles of new roadways and would result in a long-term increase of 18,220 daily induced VMT.

Using the same methodology, the Modified ATMP Roadway Improvements would construct 7.6 lane miles of new roadways, an increase of 31% over the Approved ATMP Roadway Improvements. Applying this percentage increase to 18,220 daily induced VMT would result in a total long-term increase of 23,874 daily induced VMT for the Modified ATMP Roadway Improvements. Total long-term induced VMT with the Modified ATMP Roadway Improvements represents less than 0.008% of the Projected Future Conditions Baseline total regional VMT of 283 million miles. Nonetheless, just as the ATMP EIR concluded for the Approved ATMP Roadway Improvements, the Modified ATMP Roadway Improvements would result in a significant and unavoidable impact with respect to long-term induced VMT. However, the potential increase in induced VMT with the Modified ATMP Roadway Improvements compared to the increase that would occur under the Approved ATMP Roadway Improvements (i.e., 23,874 daily induced VMT compared to 18,220 daily induced VMT) does not represent a substantial increase in the severity of the previously identified significant impact when considered in the context of total regional VMT (approximately 283 million miles in 2028).

GEOMETRIC DESIGN HAZARD OR INCOMPATIBLE USE

Impact 4.8-5 in the ATMP EIR examines whether the Approved ATMP Roadway Improvements would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use. As an initial matter, the ATMP is not a land development project and, therefore, there would be no incompatible use. The ATMP EIR included a freeway safety analysis for the I-405 northbound off-ramp to Century Boulevard, but this ramp would not be affected by the Modified ATMP Roadway Improvements and, therefore, there would be no negative effect on freeway safety.

The remaining analysis of potential geometric design hazards was based on the safety and operations of access points. Appendix G.10 of the ATMP EIR provides a detailed assessment of potential geometric design hazards associated with the Approved ATMP Roadway Improvements. The Modified ATMP Roadway Improvements introduce minor modifications to access points compared to the Approved ATMP Roadway Improvements designed to reduce conflicts and improve operations. The safety and operational factors reviewed in Appendix G.10 were reviewed in the context of the Modified ATMP Roadway Improvements, as summarized in Table 9.

As shown in Table 9, the only Modified ATMP Roadway Improvements modifications that have the potential to affect safety due to geometric design are the installations of pedestrian bridges over 96th Street at Sepulveda Boulevard and over Sepulveda Boulevard at Century Boulevard (both of which would eliminate pedestrian conflicts and thus improve safety), and the removal of the proposed traffic signal at the intersection of Sepulveda Boulevard & 96th Street. The traffic signal removal in conjunction with the pedestrian bridge at that location would improve pedestrian safety.

There are no dedicated bicycle facilities and a very limited number of bicyclists on this section of Sepulveda Boulevard. Where the Approved ATMP Roadway Improvements would provide an at-grade, signalized crosswalk across 96th Street on the east side of Sepulveda Boulevard, the Modified ATMP Roadway Improvements give bicyclists the option of using the pedestrian bridge (which is safer than an at-grade crossing) or using the unsignalized at-grade crosswalk which is the same configuration as the intersection under existing conditions. Therefore, there is no practical change in bicycle safety with the Modified ATMP Roadway Improvements as compared to the Approved ATMP Roadway Improvements.

Therefore, consistent with the conclusion in the ATMP EIR, the Modified ATMP Roadway Improvements would have a less than significant impact with respect to geometric design hazards or incompatible uses.

CUMULATIVE IMPACTS

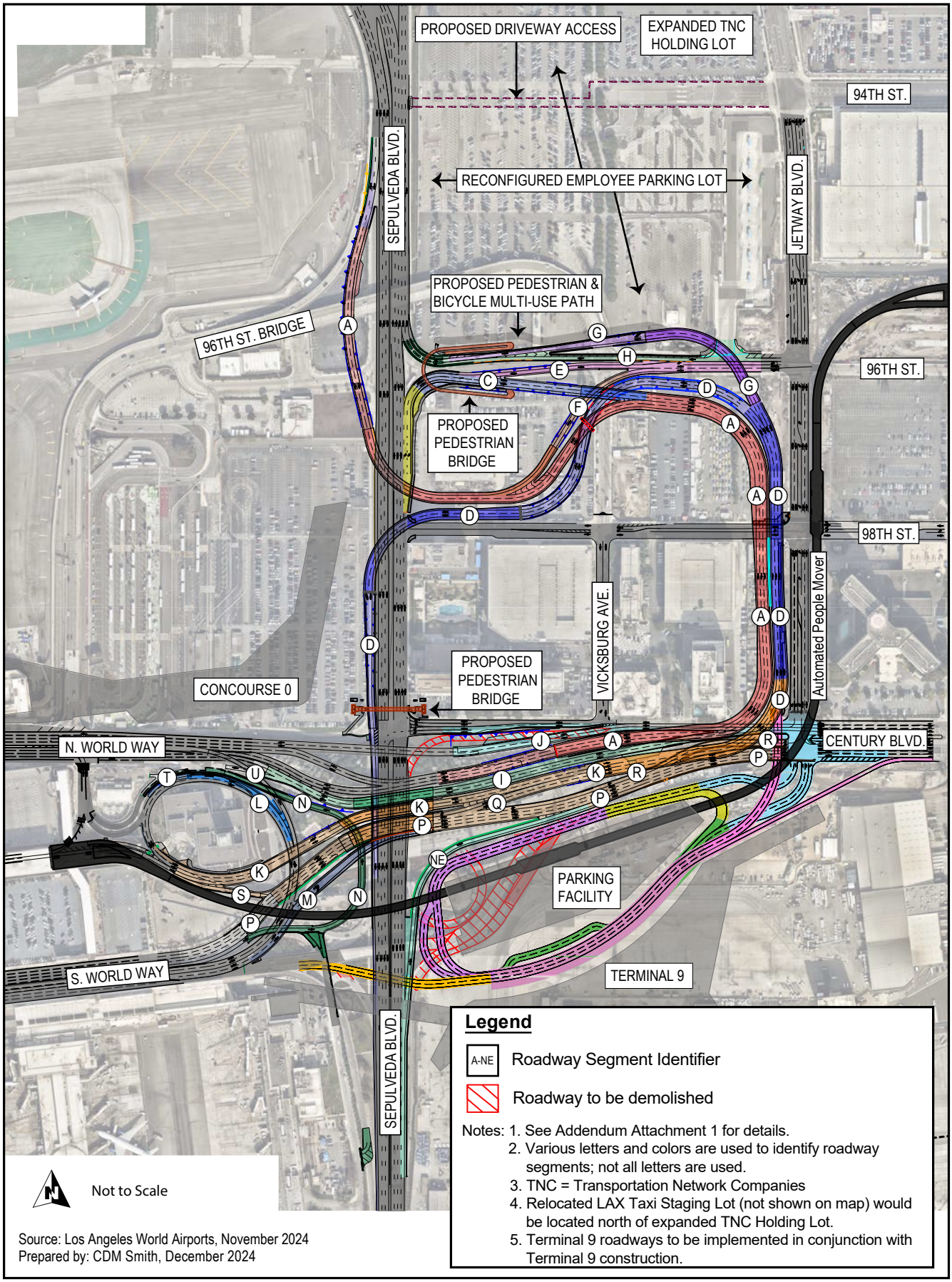
Cumulative transportation impacts are based on whether the incremental effects of the Modified ATMP Roadway Improvements would be considerable “when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects” (Public Resources Code, Section 21083, subd. (b)(2)). The Modified ATMP Roadway Improvements were analyzed in consideration of the ongoing LAX Landside Access Modernization Program and in consideration of other development projects planned in the area.

The ATMP EIR provides a full summary in Section 4.8.6 of potential cumulative transportation impacts associated with the Approved ATMP Roadway Improvements based on each of the project-level impact categories evaluated above. The minor modifications the Modified ATMP Roadway Improvements make to the Approved ATMP Roadway Improvements do not affect these conclusions except in the ways and to the extents identified above for the Modified ATMP Roadway Improvements alone. Therefore, as concluded in the ATMP EIR for the Approved ATMP Roadway Improvements, the Modified ATMP Roadway Improvements would contribute to the following cumulative impact conclusions:

Conflict with plans, programs, ordinances, and policies:	less than significant
Employee VMT:	no cumulative impact
Passenger VMT:	significant and unavoidable
Short-term induced VMT:	significant and unavoidable
Long-term induced VMT:	significant and unavoidable
Geometric design or incompatible use:	no cumulative impact

CONCLUSION

The Modified ATMP Roadway Improvements would not result in new significant transportation impacts as compared to the Approved ATMP Roadway Improvements and would not substantially increase the severity of previously identified significant transportation impacts.



Source: Los Angeles World Airports, November 2024
Prepared by: CDM Smith, December 2024

LAX Airfield and Terminal Modernization
Project EIR Addendum
Proposed Roadway System Refinements

Roadway System Refinements

Figure
1

TABLE 1
MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH APPLICABLE CITY AND REGIONAL PLANS, PROGRAMS, ORDINANCES, OR POLICIES

Plan, Program, Ordinance, or Policy	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
SCAG 2020-2045 RTP/SCS and RTIP	No change. The Modified ATMP Roadway Improvements roadway network would be incorporated into the RTP/SCS and thus would not be inconsistent with the RTP/SCS.
City of Los Angeles General Plan Framework	No change.
Los Angeles Mobility Plan 2035	No change, except that the Modified ATMP Roadway Improvements would improve pedestrian safety by installing Americans with Disabilities Act (ADA)-compliant pedestrian bridges over 96th Street at Sepulveda Boulevard and over Sepulveda Boulevard at Century Boulevard. In addition, the proposed modifications include a multi-use path along the north side of 96th Street between Sepulveda Boulevard and Jetway Boulevard. The Modified ATMP Roadway Improvements would remove the sidewalk from the west side of Jefferson Boulevard between Lincoln Boulevard and Century Boulevard. However, the limited number of pedestrians that currently use that section of sidewalk almost exclusively travel between the Central Terminal Area and Sepulveda Boulevard north of Lincoln Boulevard (as opposed to Lincoln Boulevard west of Sepulveda Boulevard). With the Modiifed ATMP Roadway Improvements, the alternative to this route is to travel on the east side of Sepulveda Boulevard, utilizing the pedestrian bridges to cross 96th Street and Sepulveda Boulevard. This alternative route adds approximately 200 feet of walking distance but eliminates the at-grade crossing of Lincoln Boulevard at Sepulveda Boulevard, which has an unusual configuration involving high-speed travel around curves with limited visibility. Signage would direct pedestrians to cross Sepulveda Boulevard at 92nd Street, where is a standard perpendicular crosswalk on a straight section of road (which is safer than crossing Lincoln Boulevard, which occurs at a skewed angle on a curved road). Overall, this change to pedestrian circulation continues to meet the goals of the Mobility Plan while maintaining safety.
LAX Plan	No change.

TABLE 1 (CONT'D)
MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH APPLICABLE CITY AND REGIONAL PLANS, PROGRAMS, ORDINANCES, OR POLICIES

Plan, Program, Ordinance, or Policy	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
Vision Zero Los Angeles	No change, except that the Modified ATMP Roadway Improvements would improve pedestrian safety by installing ADA-compliant pedestrian bridges over 96th Street at Sepulveda Boulevard and over Sepulveda Boulevard at Century Boulevard. The removal of the sidewalk on the west side of Sepulveda Boulevard between Lincoln Boulevard and Century Boulevard would reroute a small number of pedestrians to the east side of Sepulveda Boulevard, where they would utilize the pedestrian bridges.
Century Boulevard Streetscape Plan	No change.
Citywide Design Guidelines	No change, except that the Modified ATMP Roadway Improvements would improve pedestrian safety by installing ADA-compliant pedestrian bridges over 96th Street at Sepulveda Boulevard and over Sepulveda Boulevard at Century Boulevard. The removal of the sidewalk on the west side of Sepulveda Boulevard between Lincoln Boulevard and Century Boulevard would reroute a small number of pedestrians to the east side of Sepulveda Boulevard, where they would utilize the pedestrian bridges.
City of Los Angeles Safety Element	No change.
Plan for a Healthy Los Angeles	No change.
Great Streets for Los Angeles / LADOT Strategic Plan	No change.
Los Angeles Fire Department Strategic Plan 2018-2020	No change.

Note: See Table 4.8-11 of the EIR for a complete summary of the Approved ATMP Roadway Improvements' consistency with the enumerated plans, programs, ordinances, and policies.

TABLE 2
GUIDING QUESTIONS TO ADDRESS MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH PLANS, PROGRAMS, ORDINANCES, OR POLICIES

ID	Guiding Question	Relevant Plans, Policies, and Programs	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
A. Mobility Plan 2035 Public Right of Way Classification Standards for Dedications and Improvements			
A.1	Does the project include additions or new construction along a street designated as a Boulevard I or II and/or Avenue I, II, or III on property zoned for R3 or less restrictive zone?	MP 2.1, 2.3, 3.2, and Mobility Plan 2035 Street Designations and Standard Roadway Dimensions	No change.
A.2	If A.1 is yes, is the project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designations?		No change.
A.3	If A.2 is yes, is the project making the dedications and improvements as necessary to meet the designated dimensions of the frontage street?		Not applicable.
A.4	If the answer to A.3 is NO, is the project applicant asking to waive from the dedication standards?		No change.

TABLE 2 (CONT'D)
GUIDING QUESTIONS TO ADDRESS MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH PLANS, PROGRAMS, ORDINANCES, OR POLICIES

ID	Guiding Question	Relevant Plans, Policies, and Programs	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
B. Mobility Plan 2035 Public Right of Way Policy Alignment with Project-Initiated Changes			
B.1	Does the project physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property?	MP 2.1, 2.3, 3.2, 2.10, and Street Designations and Standard Roadway Dimensions	The Modified ATMP Roadway Improvements would improve pedestrian safety by installing pedestrian bridges over 96th Street at Sepulveda Boulevard and over Sepulveda Boulevard at Century Boulevard and a multi-use path along the north side of 96th Street between Sepulveda Boulevard and Jetway Boulevard. It would also remove the existing sidewalk on the west side of Sepulveda Boulevard between Lincoln Boulevard and Century Boulevard; however, the alternative pedestrian route along the east side of Sepulveda Boulevard is only marginally longer and offers a safer pedestrian experience due to reduced at-grade crossings.
B.2	Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT's Driveway Design Guidelines?	MP 2.10, Planning 1, Citywide Design Guidelines 2, Manual of Policies & Procedures Section 321	No change.

TABLE 2 (CONT'D)
GUIDING QUESTIONS TO ADDRESS MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH PLANS, PROGRAMS, ORDINANCES, OR POLICIES

ID	Guiding Question	Relevant Plans, Policies, and Programs	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
B.2.1	Would the physical changes in the public right of way or new driveways that conflict with LADOT's Driveway Design Guidelines degrade the experience of vulnerable roadway users such as modify, remove, or otherwise negatively impact existing bicycle, transit, and/or pedestrian infrastructure?	Mobility Plan 2035: Transit Enhanced Network, Bicycle Enhanced Network, Bicycle Lane Network, Pedestrian Enhanced District, Neighborhood Enhanced Network, High Injury Network, TOC Guidelines	The Modified ATMP Roadway Improvements would improve pedestrian safety by installing pedestrian bridges over 96th Street at Sepulveda Boulevard and over Sepulveda Boulevard at Century Boulevard and a multi-use path on the north side of 96th Street between Sepulveda Boulevard and Jetway Boulevard. It would also remove the existing sidewalk on the west side of Sepulveda Boulevard between Lincoln Boulevard and Century Boulevard; however, the alternative pedestrian route along the east side of Sepulveda Boulevard is only marginally longer and offers a safer pedestrian experience due to reduced at-grade crossings.
B.2.2	Would the physical modifications or new driveways that conflict with LADOT's Driveway Design Guidelines preclude the City from advancing the safety of vulnerable roadway users?		No change.

TABLE 2 (CONT'D)
GUIDING QUESTIONS TO ADDRESS MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH PLANS, PROGRAMS, ORDINANCES, OR POLICIES

ID	Guiding Question	Relevant Plans, Policies, and Programs	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
C. Network Access			
C.1.1	Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway?	MP 3.9	Vicksburg Avenue would be converted to a private road north of 98th Street serving as a driveway to a Los Angeles Department of Water and Power substation. There are no other land uses with direct access to this segment of Vicksburg Avenue. There would be no through access to 96th Street. It would not provide public access for pedestrians or bicycles; however, there are no pedestrian destinations along Vicksburg Avenue, and public access for pedestrians and bicycles would be provided along Jetway Boulevard and Sepulveda Boulevard, 600 feet to the east and west respectively.
C.1.2	If the answer to C.1.1 is Yes, will the project provide or maintain public access to people walking and biking on the street, alley, or stairway?		
C.2.1	Does the project create a cul-de-sac or is the project located adjacent to an existing cul-de-sac?	MP 3.10	
C.2.2	If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network?		

TABLE 2 (CONT'D)
GUIDING QUESTIONS TO ADDRESS MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH PLANS, PROGRAMS, ORDINANCES, OR POLICIES

ID	Guiding Question	Relevant Plans, Policies, and Programs	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
D. Parking Supply and Transportation Demand Management			
D.1	Would the project propose a supply of on-site parking that exceeds the baseline amount as required in the Los Angeles Municipal Code or a Specific Plan, whichever requirement prevails?	MP 3.8, 4.8, 4.13	Not applicable.
D.2	If the answer to D.1 is YES, would the project propose to actively manage the demand of parking by independently pricing the supply to all users (e.g., parking cash-out) or for residential properties, unbundle the supply from the lease or sale of residential units?		Not applicable.
D.3	Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21.A.16 of the LAMC?		No change.
D.4	Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential floor area?		No change.
D.5	If the answer to D.4 is YES, does the project comply with the City's TDM Ordinance in Section 12.26J of the LAMC?		No change.

TABLE 2 (CONT'D)
GUIDING QUESTIONS TO ADDRESS MODIFIED ATMP ROADWAY IMPROVEMENTS' CONSISTENCY WITH PLANS, PROGRAMS, ORDINANCES, OR POLICIES

ID	Guiding Question	Relevant Plans, Policies, and Programs	Modified ATMP Roadway Improvements Consistency, as Compared to Approved ATMP Roadway Improvements
E. Consistency with Regional Plans			
E.1	Does the Project or Plan apply one of the City's efficiency-based impact thresholds (i.e., VMT per capita, VMT per employee, or VMT per service population) as discussed in Section 2.2.3 of the TAG?		No change.
E.2	If the answer to E.1 is YES, does the Project or Plan result in a significant VMT impact?		No change.
E.3	If the answer to E.1 is NO, does the Project result in a net increase in VMT?		No change.
E.4	If the answer to E.2 or E.3 is YES, then further evaluation would be necessary to determine whether such a project or land use plan would be shown to be consistent with VMT and GHG reduction goals of the SCAG RTP/SCS.		No change.

Note: See Table 4.8-12 of the EIR for the Approved ATMP Roadway Improvements' responses to these guiding questions.
Abbreviations: LAMC = Los Angeles Municipal Code; MP = Mobility Plan 2035; TOC = Transit Oriented Communities.

TABLE 3
APPROVED ATMP EIR VMT ANALYSIS SUMMARY

Impact Number	Type of VMT	Metric	Threshold of Significance	VMT Analysis Result	EIR Conclusion
4.8-2	Employee	VMT per employee	20.4 (i.e., 15% below Projected Future Conditions Baseline in year 2028)	23.9 before mitigation; below 20.4 after mitigation	Less than significant with mitigation
4.8-3	Passenger	Total passenger VMT	Net increase over Projected Future Conditions Baseline in year 2028	8,708,995 total passenger VMT; an increase of 32,786 VMT over Projected Future Conditions Baseline in year 2028	Significant and unavoidable
4.8-4	Short-Term Induced VMT	Total VMT	Substantial increase over Projected Future Conditions Baseline in year 2028	An increase of 3,306 VMT over Projected Future Conditions Baseline in year 2028	Significant and unavoidable
	Long-Term Induced VMT	Total VMT	Substantial increase over Projected Future Conditions Baseline in year 2028	An increase of 18,220 VMT over Projected Future Conditions Baseline in year 2028	Significant and unavoidable

Note: Information from Section 4.8, Transportation, of the EIR.

TABLE 4
CHANGES IN TRAVEL DISTANCE

Travel Route	Change in Travel Distance (miles)		
	Inbound	**Outbound**	**Total**
Central Terminal Area			
Arrivals Level			
North of LAX (via Sepulveda Blvd)	+ 0.08	+ 0.02	+ 0.10
South of LAX (via Sepulveda Blvd / I-105)	+ 0.02	+ 0.11	+ 0.13
East of LAX (via Century Blvd)	+ 0.01	0.00	+ 0.01
Departures Level			
North of LAX (via Sepulveda Blvd)	+ 0.08	+ 0.01	+ 0.09
South of LAX (via Sepulveda Blvd / I-105)	+ 0.02	+ 0.10	+ 0.12
East of LAX (via Century Blvd)	+ 0.01	0.00	+ 0.01
ITF West			
North of LAX (via Sepulveda Blvd)	+ 0.12	0.00	+ 0.12
South of LAX (via Sepulveda Blvd / I-105)	- 0.01	0.00	- 0.01
East of LAX (via Century Blvd)	0.00	0.00	0.00

Note: Changes based on measurements of equivalent travel routes under Approved ATMP Roadway Improvements and Modified ATMP Roadway Improvements.

TABLE 5
CHANGE IN DAILY EMPLOYEE VMT WITH MODIFIED ATMP ROADWAY IMPROVEMENTS

Travel Route	Distribution Percentages		Daily Trips [a]		Change in Trip Length [b]		Change in VMT [c]	
	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound
Total Employee Trips			***4,095***	***4,095***				
North of LAX (via Sepulveda Blvd)	20%	20%	819	819	0.12	0	98	0
North of LAX (via Westchester Pkwy)	15%	15%	614	614	0	0	0	0
South of LAX (via Sepulveda Blvd / I-105)	40%	40%	1,638	1,638	(0.01)	0	(16)	0
East of LAX (via Century Blvd)	25%	25%	1,024	1,024	0	0	0	0
						Total Change in VMT	**82**	
						[d] **Total Change in VMT per Employee**	**0.02**	

Notes:

[a] Total daily trips from Table 4.8-7 of the EIR. Trips on each route are based on the distribution percentages as applied to the total daily trips.

[b] Changes in trip lengths, measured in miles, between the Approved ATMP Roadway Improvements and the Modified ATMP Roadway Improvements from Table 4.

[c] Change in VMT calculated as the daily trips multiplied by the change in trip length.

[d] Based on 4,700 employees.

TABLE 6
DAILY PASSENGER TRIP GENERATION
WITH APPROVED ATMP ROADWAY IMPROVEMENTS

Facility	Daily Trip Generation		
	Inbound	**Outbound**	**Total**
Central Terminal Area	82,753	85,034	167,787
ITF West	45,338	46,589	91,927
ITF East	15,460	15,460	30,920
Terminal 9	10,763	11,016	21,779
Rental Car & Other Parking	7,422	7,972	15,394
Total	**161,736**	**166,071**	**327,807**

Note: Data from Table 4.8-8 of the EIR.

TABLE 7
CHANGE IN DAILY PASSENGER VMT WITH MODIFIED ATMP ROADWAY IMPROVEMENTS

Travel Route	Distribution Percentages [a]		Daily Trips [b]		Change in Trip Length [c]		Change in VMT [d]	
	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound	Inbound	Outbound
Central Terminal Area								
Total Trips [e]			**82,753**	**85,034**				
Arrivals Level	55%		*45,514*	*46,769*				
North of LAX (via Sepulveda Blvd)	41%	12%	18,661	5,612	0.08	0.02	1,493	112
South of LAX (via Sepulveda Blvd / I-105)	25%	36%	11,379	16,837	0.02	0.11	228	1,852
East of LAX (via Century Blvd)	34%	52%	15,475	24,320	0.01	0	155	0
Departures Level	45%		*37,239*	*38,265*				
North of LAX (via Sepulveda Blvd)	50%	30%	18,620	11,480	0.08	0.01	1,490	115
South of LAX (via Sepulveda Blvd / I-105)	28%	39%	10,427	14,923	0.02	0.1	209	1,492
East of LAX (via Century Blvd)	22%	31%	8,193	11,862	0.01	0	82	0
ITF West								
Total Trips [e]			**45,338**	**46,589**				
North of LAX (via Sepulveda Blvd)	20%	20%	9,068	9,318	0.12	0	1,088	0
North of LAX (via Westchester Pkwy)	15%	15%	6,801	6,988	0	0	0	0
South of LAX (via Sepulveda Blvd / I-105)	40%	40%	18,135	18,636	-0.01	0	-181	0
East of LAX (via Century Blvd)	25%	25%	11,335	11,647	0	0	0	0
						Total Change in Passenger VMT	**8,135**	

Notes:

[a] Central Terminal Area distribution percentages based on trip generation estimates from Tables G.4-7 and G.4-8, Appendix G-4 to the EIR. They were derived by adding the total hourly trips throughout the day in each direction and dividing by the overall totals. ITF West distribution percentages are estimates.

[b] Trips on each route are based on the distribution percentages as applied to the total daily trips.

[c] Changes in trip lengths, measured in miles, between the Approved ATMP Roadway Improvements and the Modified ATMP Roadway Improvements from Table 4.

[d] Change in VMT calculated as the daily trips multiplied by the change in trip length.

[e] Total daily trips from Table 4.8-8 of the EIR and summarized in Table 6.

TABLE 8
DAILY PASSENGER VMT

With Approved ATMP Roadway Improvements	
Total Projected Future Conditions Baseline Passenger VMT [a]	8,676,209
Approved ATMP Roadway Improvements Increase in Passenger VMT [b]	32,786
Total Passenger VMT with Approved ATMP Roadway Improvements [a]	8,708,995
Passenger VMT Increase as a Percent of Total Passenger VMT	0.38%
With Modified ATMP Roadway Improvements	
Additional Increase in Passenger VMT with Modified ATMP Roadway Improvements [c]	8,135
Total Modified ATMP Roadway Improvements Increase in Passenger VMT [b]	40,921
Total Passenger VMT with Modified ATMP Roadway Improvements	8,717,130
Passenger VMT Increase as a Percent of Total Passenger VMT [d]	0.47%

Notes:

[a] Passenger VMT from Table 4.8-10 of the EIR.

[b] Compared to Projected Future Conditions Baseline Passenger VMT of 8,676,209.

[c] See Table 7.

[d] Difference between passenger VMT increase as a percentage of total passenger VMT with Modified ATMP Roadway Improvements compared ot Approved ATMP Roadway Improvements = 0.09% increase.

TABLE 9
REVIEW OF POTENTIAL HAZARDS RELATING TO A GEOMETRIC DESIGN FEATURE

Feature	Comparison to Approved ATMP Roadway Improvements
The relative amount of pedestrian activity at the project access points.	
Century Boulevard & Jetway Boulevard	The Modified ATMP Roadway Improvements would include a new multi-use path on the north side of 96th Street between Sepulveda Boulevard and Jetway Boulevard. This change improves pedestrian safety compared with the Approved ATMP Roadway Improvements.
Sepulveda Boulevard & 96th Street	Under the Approved ATMP Roadway Improvements, this intersection would be signalized with an at-grade crosswalks across 96th Street on the east side of Sepulveda Boulevard. With the Modified ATMP Roadway Improvements, the intersection would remain unsignalized as in the existing condition, and pedestrian crossings would be grade-separated via a dedicated pedestrian bridge. A new multi-use path along 96th Street would be constructed as part of the Modified ATMP Roadway Improvements. This change improves pedestrian safety compared with the Approved ATMP Roadway Improvements.
Sepulveda Boulevard & Century Boulevard	The Modified ATMP Roadway Improvements would include a new pedestrian bridge across Sepulveda Boulevard at Century Boulevard, ensuring that pedestrian traffic and vehicular traffic will not conflict. This change improves pedestrian safety compared with the Approved ATMP Roadway Improvements.
Sepulveda Boulevard south of World Way	No change.
Vicksburg Avenue between 96th Street and 98th Street	Vicksburg Avenue would be converted to a private road north of 98th Street serving as a driveway to a Los Angeles Department of Water and Power substation. There are no other land uses with direct access to this segment of Vicksburg Avenue. There would be no pedestrian or bicycle access to 96th Street along Vicksburg Avenue. This change reduces pedestrian accessibility compared with the Approved ATMP Roadway Improvements, but there are no pedestrian attractors and thus would be limited, if any, pedestrian demand. Pedestrian safety would not be compromised as there would be superior pedestrian routes along Jetway Boulevard and Sepulveda Boulevard, 600 feet to the east and west respectively.

TABLE 9 (CONT'D)
REVIEW OF POTENTIAL HAZARDS RELATING TO A GEOMETRIC DESIGN FEATURE

Feature	Comparison to Approved ATMP Roadway Improvements
Design features / physical configurations that affect pedestrian and bicycle visibility.	
Century Boulevard & Jetway Boulevard	The Modified ATMP Roadway Improvements would include a new multi-use path on the north side of 96th Street between Sepulveda Boulevard and Jetway Boulevard. This change improves pedestrian safety compared with the Approved ATMP Roadway Improvements.
Sepulveda Boulevard & 96th Street	Under the Approved ATMP Roadway Improvements, this intersection would be signalized with an at-grade crosswalk across 96th Street on the east side of Sepulveda Boulevard. With the Modified ATMP Roadway Improvements, the intersection would remain unsignalized as in the existing condition, and pedestrian crossings would be grade-separated via a dedicated pedestrian bridge. This change eliminates pedestrian conflicts, but maintains the existing configuration with free right turns between Sepulveda Boulevard and 96th Street. As such, bicyclists traveling north on Sepulveda Boulevard would have less protection when crossing 96th Street compared to the Approved ATMP Roadway Improvements that provided for a signalization of the subject intersection. Notwithstanding, Sepvuleda Boulevard is not a designated bicycle route and does not carry (and is not anticipated to carry in the future) much bicycle traffic. For those bicyclists traveling north on Sepulveda Boulevard, the proposed bridge crossing of 96th Street will be ADA-compliant, which would enable bicyclists to safely walk their bikes over 96th Street. A new multi-use path along 96th Street would also be constructed as part of the Modified ATMP Roadway Improvements.
Sepulveda Boulevard & Century Boulevard	The Modified ATMP Roadway Improvements would include a new pedestrian bridge across Sepulveda Boulevard at Century Boulevard, ensuring that pedestrian traffic and vehicular traffic will not conflict. This change eliminates pedestrian conflicts compared with the Approved ATMP Roadway Improvements and does not affect bicycle visibility.

TABLE 9 (CONT'D)
REVIEW OF POTENTIAL HAZARDS RELATING TO A GEOMETRIC DESIGN FEATURE

Feature	Comparison to Approved ATMP Roadway Improvements
Sepulveda Boulevard	The Modified ATMP Roadway Improvements include removal of the existing sidewalk on the west side of Sepulveda Boulevard between Lincoln Boulevard and Century Boulevard. The alternative route would have pedestrians cross Sepulveda Boulevard at 92nd Street and the pedestrian bridge at Century Boulevard, walking on the east side of Sepulveda Boulevard (and also utilizing the pedestrian bride aver 96th Street). For the vast majority of pedestrians using Sepulveda Boulevard, this eliminates the need to cross Lincoln Boulevard at Sepulveda Boulevard, which is a high-speed, curving corridor with limited visibility. Therefore, this change reduces conflicts between pedestrians and vehicles compared with the existing condition. This change was considered as part of the Approved ATMP Roadway Improvements but was not assessed in the EIR.
98th Street	No change.
Other factors.	
The type of bicycle facilities the Project driveways cross and the level of utilization.	No change.
The physical conditions that could result in hazards between vehicles, bicycles, and pedestrians.	No change.
The project location relative to proximity to the High Injury Network or a Safe Routes to School program area.	No change.
Any other conditions that could substantially increase a transportation hazard.	No change.

Note: See Appendix G.10 of the EIR for the Approved ATMP Roadway Improvements' evaluation of these issues.