Final Environmental Impact Report (Final EIR)

[State Clearinghouse No. 2009041043]

for

Los Angeles International Airport (LAX)
Central Utility Plant Replacement Project

Volume 3

Responses to Comments
and
Corrections and Additions to the Draft EIR

Final Environmental Impact Report

This document (Volume 3) comprises the second and final part of the Environmental Impact Report for the Central Utility Plant Replacement Project (CUP-RP) and supplements the Draft EIR for the CUP-RP (consisting of Volumes 1 and 2), previously circulated for public review and comments. The CUP-RP EIR is available for review at Los Angeles World Airports (LAWA), 7301 World Way West, 3rd Floor, Los Angeles, CA 90045.

City of Los Angeles

Los Angeles City File No. EIR-09021-AD

October 2009

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PREFACE

This document, in conjunction with the previously prepared documents described below, constitutes the Final Environmental Impact Report (Final EIR) for the Central Utility Plant Replacement Project (CUP-RP) proposed at Los Angeles International Airport (LAX). As further described in the Introduction to this document, the CUP-RP includes the replacement of the existing CUP and maintenance shop building, including a new cogeneration facility; replacement of existing cooling towers; construction of an underground thermal energy storage (TES) tank at the site of the existing CUP; electrical upgrades to include a new electrical substation and a retro-fit of the existing LADWP substation; installation of a new fire management and fire life safety system; replacement of the direct buried chilled and hot water service lines in the CTA as well as new electrical communication duct banks, and reclaimed, potable and fire water pipelines co-located with the chilled and hot water service lines; and replacement of existing older equipment in existing mechanical equipment rooms. In accordance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA), a self supporting administrative department of the City of Los Angeles, as Lead Agency, completed an Environmental Impact Report (EIR) to address and disclose the potential environmental impacts associated with the proposed project. The City of Los Angeles circulated a Draft EIR regarding the CUP-RP, received public and agency comments on the Draft EIR, and prepared written responses to those comments - all of which provides the basis for this Final EIR.

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

(a) The draft EIR or a revision of the draft.

(b) Comments and recommendations received on the draft EIR either verbatim or in summary.

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

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

Accordingly, the Final EIR for the CUP-RP consists of two components as follows:

Component 1: Draft EIR and Technical Appendices

Volume 1- Draft EIR and Technical Appendices: Volume 1 of the Final EIR includes the Draft EIR-Main Document, which was distributed for public review and comment from July 30, 2009 through September 14, 2009, and Technical Appendices A through B, which were developed in conjunction with the Draft EIR.

Volume 2 - Draft EIR Technical Appendix C: Volume 2 of the Final EIR consists of Technical Appendix C, which was developed in conjunction with the Draft EIR.

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

Volume 3 - Responses to Comments and Corrections and Additions to the Draft EIR: The second part of the Final EIR consists of a compilation of the comments received on the Draft EIR, and the written responses prepared by the City of Los Angeles to those comments. This document includes indices (i.e., lists) of agencies, organizations, and individuals that commented on the Draft EIR, and provides a copy of the comment letters in their original form (i.e., photocopies of comment letters). This document also describes other information, such as a delineation of corrections and additions to information presented in the Draft EIR, which has been added by the City of Los Angeles as part of the Final EIR. The information presented herein constitutes the second component of the Final EIR.

All of the documents described above, comprising the Final EIR for the CUP-RP, are available for public review at:

LAWA Administration Building
Environmental Services Division
7301 World Way West, 3rd Floor
Los Angeles, CA 90045
Contact: Lisa Dugas
(310) 646-3853 x 1053

The Final EIR is also available online at www.ourlax.org

1. INTRODUCTION AND INDICES

1.1 Introduction

In compliance with the California Environmental Quality Act (CEQA), the City of Los Angeles has completed this Environmental Impact Report (EIR) for the Los Angeles International Airport (LAX) Central Utility Plant Replacement Project (CUP-RP). As described in the Preface of this document, the Final Environmental Impact Report (Final EIR) for the CUP-RP consists of two components, the Draft EIR consisting of Volumes 1 and 2, and Volume 3 - Responses to Comments and Corrections and Additions to the Draft EIR.

A detailed description of the CUP-RP is provided in Volume 1 of the EIR (see Chapter 2 in the Draft EIR-Main Document). On July 30, 2009, the City of Los Angeles published a Draft EIR for the proposed CUP-RP. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period closing on September 14, 2009. One public meeting was held at the LAX Flight Path Learning Center during the comment period on August 18, 2009.

As explained in more detail in Volume 1 of the EIR, the CUP-RP would replace the existing CUP and cogeneration facilities at LAX. The existing CUP produces hot and chilled water that provide for heating and cooling of the terminals within the Central Terminal Area (CTA) and generates electricity (cogeneration) that is sold back to the Los Angeles Department of Power (LADWP). Included as part of the CUP-RP are the following components: replacement of the existing CUP and maintenance shop building, including a new cogeneration facility; replacement of existing cooling towers; construction of an underground thermal energy storage (TES) tank at the site of the existing CUP; electrical upgrades to include a new electrical substation and a retro-fit of the existing LADWP substation; installation of a new fire management and fire life safety system; replacement of the direct buried chilled and hot water service lines in the CTA, as well as new electrical communication duct banks, and reclaimed, potable and fire water pipelines co-located with the chilled and hot water service lines; and replacement of existing older equipment in existing mechanical equipment rooms. In addition, the project includes the potential installation of a recycled-reclaimed water pipeline and treatment system, as well as the potential use of biogas from the Hyperion Treatment Plant (HTP) to augment the natural gas system. Construction of these improvements would require demolition of the existing CUP and associated ancillary facilities. Staging for construction equipment, as well as construction worker parking, would be located in surface parking lots within the CTA.

In accordance with CEQA Guidelines Section 15088, the City of Los Angeles prepared responses to all comments received on the Draft EIR. As required by the CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." Detailed responses are not provided to comments on the merits of the proposed project or on other topics that do not relate to environmental issues.

This document, which is the second component of the Final EIR, presents the comments received during the public review period for the Draft EIR and provides written responses to those comments. A total of eight comment letters were received on the Draft EIR during and shortly after the close of the public review period, and three individuals provided oral comments at the August 18, 2009 public meeting. The indices presented at the end of this chapter list the agencies, organizations, and individuals that submitted comments on the Draft EIR. Copies of all comment letters received, as well as the transcription of the public meeting, are provided in Attachment 1 of this document. Chapter 2 of this document presents individual responses prepared by the City of Los Angeles to comments received on the Draft EIR (July 30, 2009 to September 14, 2009). While not required by CEQA, the City of Los Angeles has also prepared responses to comments contained in two letters received after the close of the comment period for the Draft EIR. Chapter 3 of this document provides corrections and additions to information presented in the Draft EIR.

The format for the responses to comments presents, on a letter-by-letter basis, each comment, which is then followed immediately by a response. The comments and responses are organized and grouped into

categories based on the affiliation of the commenter. The comments are presented in the following order: state agencies, regional agencies, and public comments (i.e., letters from private citizens, organizations, etc.).

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the first letter within the group of regional agencies submitting comments on the Draft EIR is from the South Coast Air Quality Management District, and the text of the letter is considered to have one individual comment. The subject letter was assigned the alphanumeric label, "CUP-AR00001", representing Central Utility Plant Replacement Project-Agency-Regional Agency-Letter No. 1". The comments within each letter are labeled in numerical order such as CUP-AR00002-1, CUP-AR00002-2, CUP-AR00002-3, CUP-AR00002-4, CUP-AR00002-5, etc. The same basic format and approach is used for the comment letters from state agencies ("AS"), public comments ("PC"), and the public hearing ("PH").

The following are the prefix codes used for categorizing the comment letter types:

Letter ID Prefix	Description
AS	State Agency
AR	Regional Agency
PC	Public Comment
PH	Public Hearing

To assist the reader's review and use of the responses to comments, three indices are provided. These indices provide the alphanumeric label number, commenter name, affiliation (i.e., name of agency or organization that the author represents), and date (if provided) of each comment letter. The first index lists all of the comment letters by alphanumeric label number, the second index lists all of the comment letters by the commenter's last name, and the third index lists all of the comment letters by the affiliation, if any, of the commenter.

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

Immediately following each typed comment is a written response developed by the City of Los Angeles. In many instances, the response to a particular comment may refer to the response(s) to another comment(s) that expressed the same concern or is otherwise related. Cross-referencing of responses uses the alphanumeric index system described above. For example, a response may indicate "Please see Response to Comment CUP-RP-AR00002-2" if that response addresses the same concern expressed in a different comment.

Together with Volumes 1 and 2 (the Draft EIR and appendices), the responses to comments, along with the corrections and additions to the Draft EIR, constitute the Final EIR. Pursuant to CEQA, the Final EIR is not circulated for another round of comments and responses. The Final EIR is presented to the decision-makers for their use in considering the project. Interested persons may comment on the Final EIR, including these responses, in the course of the decision-making process related to the CUP-RP; however, the City is not required to provide responses to such comments.

1.2 Indices of Comment Letters

Following are three indices that organize the comment letters by letter identification number, commenter, and affiliation.

Index by Letter Identification (ID) Number

Letter ID	Commenter	Affiliation/Lead Agency	Department	Date
CUP-AS00001	Morgan, Scott	State of California - Governor's Office of Planning and Research	State Clearinghouse and Planning Unit	Sep 15 2009
CUP-AR00001	Baker, Ph.D., Jillian	South Coast Air Quality Management District (SCAQMD)		Sep 3 2009
CUP-AR00002	Nakamura, Susan	SCAQMD	Planning, Rule Development & Area Sources	Sep 18 2009
CUP-PC00001	Schneider, Denny	Alliance for a Regional Solution to Airport Congestion (ARSAC)		Sep 14 2009
CUP-PC00002	Dragone, John	Los Angeles International Airport Area Advisory Committee (LAXAAC)		Sep 14 2009
CUP-PC00003	Bischoff, David	None Provided		Sep 14 2009
CUP-PC00004	Cope, Danna	None Provided		Sep 14 2009
CUP-PC00005	Cain, Gavin	Jenkins/Gales and Martinez, Inc.		Aug 24 2009
CUP-PH00001	Bischoff, David	None Provided		Aug 18 2009
CUP-PH00002	Schneider, Nan	ARSAC		Aug 18 2009
CUP-PH00003	MacLellan, Nora	Westchester/Playa Neighborhood Council		Aug 18 2009

Index by Commenter

Commenter	Affiliation/ Agency	Department	Date	Letter ID
Baker, Ph.D., Jillian	South Coast Air Quality Management District (SCAQMD)		Sep 3 2009	CUP-AR00001
Bischoff, David	None Provided		Aug 18 2009	CUP-PH00001
Bischoff, David	None Provided		Sep 14 2009	CUP-PC00003
Cain, Gavin	Jenkins/Gales and Martinez, Inc.		Aug 24 2009	CUP-PC00005
Cope, Danna	None Provided		Sep 14 2009	CUP-PC00004
Dragone, John	Los Angeles International Airport Area Advisory Committee (LAXAAC)		Sep 14 2009	CUP-PC00002
MacLellan, Nora	Westchester/Playa Neighborhood Council		Aug 18 2009	CUP-PH00003
Morgan, Scott	State of California - Governor's Office of Planning and Research	State Clearinghouse and Planning Unit	Sep 15 2009	CUP-AS00001
Nakamura, Susan	SCAQMD	Planning, Rule Development & Area Sources	Sep 18 2009	CUP-AR00002
Schneider, Denny	Alliance for a Regional Solution to Airport Congestion (ARSAC)		Sep 14 2009	CUP-PC00001
Schneider, Nan	ARSAC		Aug 18 2009	CUP-PH00002

Index by Affiliation

Affiliation/Agency	Department	Commenter	Date	Letter ID
Alliance for a Regional Solution to Airport Congestion (ARSAC)		Schneider, Nan	Aug 18 2009	CUP-PH00002
ARSAC		Schneider, Denny	Sep 14 2009	CUP-PC00001
Jenkins/Gales and Martinez, Inc.		Cain, Gavin	Aug 24 2009	CUP-PC00005
Los Angeles International Airport Area Advisory Committee (LAXAAC)		Dragone, John	Sep 14 2009	CUP-PC00002
None Provided		Bischoff, David	Aug 18 2009	CUP-PH00001
None Provided		Bischoff, David	Sep 14 2009	CUP-PC00003
None Provided		Cope, Danna	Sep 14 2009	CUP-PC00004
South Coast Air Quality Management District (SCAQMD)		Baker, Ph.D., Jillian	Sep 3 2009	CUP-AR00001
SCAQMD	Planning, Rule Development & Area Sources	Nakamura, Susan	Sep 18 2009	CUP-AR00002
State of California - Governor's Office of Planning and Research	State Clearinghouse and Planning Unit	Morgan, Scott	Sep 15 2009	CUP-AS00001
Westchester/Playa Neighborhood Council		MacLellan, Nora	Aug 18 2009	CUP-PH00003

2. COMMENTS AND RESPONSES

CUP-AS00001	**Morgan, Scott**	**State of California Governor's Office of Planning and Research State Clearinghouse**	**9/15/2009**

CUP-AS00001-1

Comment: The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 14, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Response: The comment is noted. It is also acknowledged that no agencies that received copies of CUP-RP Draft EIR from the State Clearinghouse submitted comments on the Draft EIR to the State Clearinghouse or LAWA by September 14, 2009.

CUP-AR00001	**Baker, Jillian**	**South Coast Air Quality Management District (SCAQMD)**	**9/3/2009**

CUP-AR00001-1

Comment: This email is a follow-up to a couple of voicemails I left you regarding additional files that are necessary for AQMD's review of the Air Quality Dispersion Modeling and HRA prepared for the LAX Central Utility Plant Replacement Project DEIR. Please provide electronic copies of the following files:

1) AERMOD input and output files
2) DEM files used in AERMOD
3) Meteorological data used in AERMOD
4) BPIP input and output files
5) HARP input and output files
6) Emission files used in HARP for calculating the health risk
7) A README file which describes each electronic file provided

Response: As requested, the referenced air quality and health risk assessment modeling files were sent by overnight delivery to SCAQMD on September 9, 2009 and were received by the agency on September 10, 2009. LAWA also granted SCAQMD a four day extension for submitting comments.

CUP-AR00002 Nakamura, Susan SCAQMD 9/18/2009

CUP-AR00002-1

Comment: The South Coast Air Quality Management District's comments on the Draft EIR for the proposed LAX Central Utility Plant Replacement Project are provided in the enclosed letter. Please be advised that you will also receive the letter by fax and U.S. Mail. If you have any questions regarding these comments the appropriate contact information is enclosed.

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff appreciates the fact that the lead agency allowed additional time in which to submit comments. Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Response: The comment is noted. In accordance with CEQA Guidelines §15088, LAWA has prepared written responses to all comments received on the CUP-RP Draft EIR. These responses are provided herein as part of this Final EIR. Responses to specific SCAQMD comments are provided below. LAWA will provide SCAQMD with written responses to the agency's comments in accordance with Public Resources Code §20192.5 prior to certification of the Final EIR.

CUP-AR00002-2

Comment: **Construction and Operational Air Quality Analysis**

1. In Section 4.2.6 (Impact Analysis) of the Air Quality Analysis for the Draft EIR the lead agency assesses the localized air quality impacts from the proposed construction activities. The lead agency summarizes the maximum daily construction emissions from the project's proposed recycled/reclaimed water treatment facility in Table 4.2-14 on page 4-80. On page 4-79 the lead agency states that the closest alternative location for the recycled/reclaimed water treatment facility to a sensitive receptor is Site 3, however, the lead agency does not clearly delineate the desired location for the facility or the alternative location(s) and its distance from the central terminal area. As a result, SCAQMD staff cannot determine the potential peak daily emission impacts from the project.

SCAQMD staff recommends that the lead agency clearly delineate the potential sites for the recycled/reclaimed water treatment facility in Figure 4.2-1 and 4.2-3 and demonstrate that the distance between the central terminal area and the two potential recycled/reclaimed water treatment facility sites does not create shared impacts among any sensitive receptors during project construction. Once the lead agency has revised Figure 4.2-1 and 4.2-3 the SCAQMD staff requests that the lead agency revise Table 4.2-14 (Emissions From Recycled/Reclaimed Water Treatment Facility and Pipeline Construction) of the Construction Air Quality Analysis in the Final EIR quantifying

peak daily air quality impacts and summarizing all emissions from the planned construction activities including NOx, SOx, CO, PM10, PM 2.5 and VOC.

Response: The statement on page 4-79 of the CUP-RP Draft EIR regarding Site 3 is incorrect. Although Site 3 was included in the NOP as a candidate site for the treatment facility, it was dropped from further consideration during preparation of the Draft EIR given the more favorable setting and proximity of Sites 1 and 2. The only water treatment facility sites carried forward into the analysis are Potential Sites 1 and 2, with distances to the nearest receptors of 700 meters and 350 meters, respectively (as noted in Table 4.2-13 of the CUP-RP Draft EIR). Therefore, no revisions to Figure 4.2-1, Figure 4.2-3 or Table 4.2-14 of the CUP-RP Draft EIR are necessary. However, please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR concerning the reference to Site 3.

The sites proposed for the water treatment facility are shown in Chapter 2 of the CUP-RP Draft EIR, in Figure 2-4 (page 2-9). Potential Treatment Site 1 is the closest to the CUP, and is located on the southeast corner of West 96th Street and Vicksburg Avenue, roughly 1.2 kilometers northeast of the existing CUP. Potential Treatment Site 2 is located on the northeast corner of West 96th Street and Jenny Avenue, roughly 1.5 kilometers northeast of the existing CUP. At these distances from the main CUP-RP construction site, the contribution of the main CUP-RP construction activities to concentration impacts are easily a factor of 10 to 100 times lower than the concentrations at the CTA receptor that is roughly 120 meters downwind of the CUP-RP site. (Tables 4.2-18 and 4.2-19 of the CUP-RP Draft EIR show the uncontrolled and controlled construction-related concentrations at the CTA receptor.) Therefore, the concentrations from the main CUP-RP construction activities would not add substantially to the concentrations from the treatment facility construction in the vicinity of the proposed treatment facility sites, and peak daily emission impacts from the project would not occur in the vicinity of the proposed treatment facility sites.

CUP-AR00002-3

Comment: 2. On page 4-59 of the Draft EIR the lead agency states that the ammonia emissions were calculated using the turbine exhaust gas flow rate and assumed concentration of ammonia in the exhaust gas. The lead agency assumed concentrations of 5 parts per million by volume (ppmv) based on the notion that this is the limit for ammonia slip from selective catalytic reduction (SCR) units typically imposed by SCAQMD. However, the current SCAQMD's current best available control technology (BACT) requirements for a major source facility limit ammonia slip from SCR units to 2.5 ppmv. SCAQMD staff requests that the lead agency revise the ammonia emissions calculations to reflect the current SCAQMD BACT requirements for a major source facility.

Response: The analysis in the CUP-RP Draft EIR is conservative in that it assumes the ammonia slip emissions from the new turbines, with selective catalytic reduction for NOx control, would be 5 ppmv instead of the current BACT level of 2.5 ppmv. Since ammonia impacts are primarily as an acute air toxic compound and as a precursor to secondary PM2.5 formation, changing the ammonia discharge level to 2.5 ppmv would further reduce impacts already determined to be less than significant. Therefore, the analysis does not need to be revised for CEQA purposes. However, it is understood that ammonia slip would be limited to 2.5 ppmv under the air quality permit that would need to be obtained from SCAQMD prior to constructing the new CUP facilities.

CUP-AR00002-4

Comment: **Health Risk Assessment**

3. The health risk assessment conducted by the lead agency considered risks based on the inhalation pathway and did not include a multi-pathway analysis, as recommended by the SCAQMD. As a result the health risk impacts concluded by the lead agency were under-estimated. For example, using the maximally exposed worker receptor, the existing cancer risks are 0.46 per million which will increase to 0.53 per million with the project. Thus, the incremental cancer risk increase is 0.07 per million which is higher than the 0.004 per million reported in the DEIR. The SCAQMD staff requests that the lead agency revise the health risk assessment using the guidance found at the following web addresses:

http://www.aqmd.gov/prdas/ab2588/pdf/AB2588_Guidelines.pdf

http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html

http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html

Response: As part of the LAX Master Plan EIS/EIR, a multi-pathway analysis was conducted at a screening level. Indirect exposure pathways involving deposition of toxic air contaminants (TACs) onto soils and subsequent human exposure via incidental ingestion of this soil, uptake from soil into homegrown produce, and other such indirect pathways were analyzed via prediction of the amount of TACs that might deposit onto soils. This analysis indicated that deposition onto soil would not be sufficient to cause noteworthy exposure through any of the above pathways, and, in fact, potential impacts to soil were predicted to be too small to be measurable against urban background. Since this analysis was carried out using maximum predicted air concentrations, it is conservative for all locations on and near the airport. In addition, the predicted minimal deposition of TACs onto soils indicates that potential impacts to local surface water and sediment would also be minimal.

The exposure pathway analysis found that inhalation of TACs was the primary exposure pathway in which people living, working, or attending school near LAX might be exposed and that essentially all possible risk was attributable to releases of only a few chemicals, including diesel particulates, 1,3-butadiene, benzene, and acrolein. These findings are entirely consistent with results of other analyses, including assessments performed for El Toro, Oakland International and Long Beach International Airport EIRs. Details of the multi-pathway analysis conducted for the LAX Master Plan are provided in Technical Report 14a of the LAX Master Plan EIS/EIR which can be found online at: http://www.laxmasterplan.org/docs/draft_eir_NE/T14a_LR.pdf. Although the CUP-RP is not an LAX Master Plan project, the findings of the LAX Master Plan human health risk assessment are applicable and have been incorporated into the CUP-RP human health risk assessment, where appropriate. In particular, the analysis of cancer risk included in Section 4.3 of the CUP-RP Draft EIR indicates that diesel particulate matter (DPM) accounted for approximately 96 percent of the construction-related cancer risk (page 4-110). According to the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (the third reference listed by the commenter), "[t]he cancer risks from DPM occur exclusively through the inhalation pathway" (page 8). Therefore, based on the multi-pathway analysis presented in the LAX Master Plan EIS/EIR and this guidance, including a multi-pathway analysis would not substantially change the outcome of the human health risk assessment conducted for the CUP-RP (i.e., incremental cancer risk increase noted in the comment is 0.07 per million, as compared to 0.004 per million indicated in the CUP-

RP Draft EIR; however, both values are well below the significance threshold of 10 per million). Since neither the incremental risk, nor total risk after completion of the CUP-RP, results in a significant health risk impact using either the original assessment presented in the CUP-RP Draft EIR or the commenter's suggestions, a revision of the CUP-RP human health risk assessment is not considered necessary, nor would it add substantial additional information on human health impacts. This conclusion is bolstered by recognition that the receptor in question is an adult worker in the CTA. Other than inhalation, incidental ingestion of and dermal contact with soil are the only exposure pathways that exist and might be "complete" for these workers. Other exposure pathways would be "incomplete"; for example, ingestion of home-grown fruits or vegetables and exposure to surface water and sediment would not be possible since these media do not exist at the CTA.

CUP-AR00002-5

Comment: Regional and Localized Construction and Operational Mitigation

4. In addition to the air quality mitigation measures proposed in Table 4.2-10 on page 4-76 and 4-77 of the Draft EIR the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx:

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
- Require the use of alternative fueled off-road construction equipment,
- Restrict operation to "clean" trucks, such as a 2007 or newer model year,
- Develop park and ride programs,
- Improve traffic flow by signal synchronization, and
- Require construction parking to be configured such that traffic interference is minimized.

Fugitive Dust:

- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation, and

- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks.

VOC:

- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

Additional construction and operational mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Response: The mitigation measures listed in the comment were considered in association with preparation of the CUP-RP Final EIR. In response to this comment, the SCAQMD's list of suggested mitigation measures was reviewed again on October 1, 2009. The following discussion addresses each suggested mitigation measure identified by SCAQMD.

For background, as indicated on page 4-42 in Section 4.1,7 and pages 4-74 and 4-75 in Section 4.2.5 of the CUP-RP Draft EIR, although the CUP-RP is not a component of the LAX Master Plan, LAWA is proposing that applicable commitments and mitigation measures identified in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) be implemented as part of the CUP-RP. As indicated in Section 4.2.5 of the CUP-RP Draft EIR, LAX Master Plan Mitigation Measures that address air quality impacts and that are applicable to the CUP-RP, include Mitigation Measures MM-AQ-1, LAX Master Plan - Mitigation Plan for Air Quality, and MM-AQ-2, Construction-Related Measure. In addition, as discussed on page 4-76 of the CUP-RP Draft EIR, the LAX Master Plan Community Benefits Agreement (CBA) includes several measures that are applicable to the CUP-RP to address construction-related air quality impacts. Specifically, CBA Section X.F requires the use of the best available control devices. This requirement has been incorporated into the CUP-RP, as discussed further below. Further, as indicated in Section 4.1.7 of the CUP-RP Draft EIR, a number of LAX Master Plan Commitments that address surface transportation impacts, as well as air quality impacts, are applicable to the CUP-RP. These include Commitments C-1, Establishment of a Ground Transportation/Construction Coordination Office, ST-2, Non-Peak CTA Deliveries, ST-17, Maintenance of Haul Routes, and ST-18, Construction Traffic Management Plan. As discussed below, many of the mitigation measures suggested by the SCAQMD in the comment are included as part of the LAX Master Plan CBA and MMRP. All applicable LAX Master Plan Commitments and Mitigation Measures identified in the CUP-RP Draft EIR, including those mitigation measures and commitments identified above, will be included as part of the MMRP for the CUP-RP.

The first measure listed in the comment under "NOx" is infeasible in the Central Terminal Area (CTA) of LAX, and ineffective for either of the off-airport recycled/reclaimed water facility construction sites under consideration. Near the main CUP-RP construction site, in the CTA, providing dedicated turn lanes for construction vehicles would impede, rather than improve, overall traffic flow. See LAX Master Plan commitments summarized in Table 1-1, pages 1-6 to 1-8 of the CUP-RP Draft EIR, for details regarding construction traffic mitigation strategies. Providing dedicated turn lanes for ingress or egress of construction vehicles at either of the two proposed off-airport recycled/reclaimed water treatment facility sites would not be an effective or feasible measure because: 1) there is a relatively low intensity of construction vehicle traffic anticipated at those two locations, 2) applicable LAX Master Plan Commitments would be incorporated to ensure that traffic impacts associated with construction of the off-airport recycled/reclaimed water facility and associated pipeline would be less than significant (refer to pages 4-51 and 4-52 of

the CUP-RP Draft EIR), and 3) the measure would not appreciably affect anticipated construction traffic at the facility sites or NOx emissions associated with such traffic.

The second through eighth bullet point suggestions listed in the comment under the heading "NOx" have already been incorporated as mitigation for the CUP-RP. The second measure listed in the comment under "NOx" is incorporated in the CUP-RP as part of LAX Master Plan Mitigation Measure MM-AQ-2. Part of MM-AQ-2, as noted in Table 1-1, on page 1-10 of the CUP-RP Draft EIR, as well as in Table 4.2-10, on page 4-76 of the CUP-RP Draft EIR, is a requirement that, to the extent feasible, construction employees will work and commute during off-peak hours. The full text of MM-AQ-2 is provided in Chapter 3, Corrections and Additions to the CUP-RP Draft EIR. In addition, LAX Master Plan Commitment C-1 (Establishment of a Ground Transportation/Construction Coordination Office), included in Table 1-1 on page 1-6 of the CUP-RP Draft EIR, provides for coordinating deliveries and enforcing delivery times. LAX Master Plan Commitment ST-2, included in Table 1-1 on page 1-7 of the CUP-RP Draft EIR, requires that deliveries to construction projects "be limited to off-peak traffic hours whenever possible." The third measure listed in the comment under "NOx" suggests temporary traffic controls to maintain a smooth traffic flow. This suggestion has already been incorporated into the CUP-RP. LAX Master Plan Commitment C-1 involves monitoring traffic conditions and providing temporary traffic controls if needed. LAX Master Plan Commitment ST-18 requires a complete construction traffic management plan, which includes developing communication methods with airport passengers. (CUP-RP Draft EIR, Table 1-1, page 1-8.)

Regarding the fourth and fifth measures listed in the comment under "NOx", the LAX Master Plan CBA requires best available emission control devices be installed on diesel construction equipment. That provision is reproduced in its entirety on page 4-77 of the CUP-RP Draft EIR. In accordance with CBA commitments, LAWA anticipates that construction contractors for the CUP-RP would use alternative fueled equipment, newer engine model year trucks, or other approved and available emission control strategies when feasible.

The sixth measure listed in the comment under "NOx" is included as part of LAX Master Plan Mitigation Measure MM-AQ-3, the transportation measure referenced in LAX Master Plan Mitigation Measure MM-AQ-1, which has been incorporated into the CUP-RP. The full text of MM-AQ-1 is provided in Chapter 3, Corrections and Additions to the CUP-RP Draft EIR; the full text of MM-AQ-3 is provided in the LAX Master Plan MMRP available at http://www.ourlax.org/pub_MMRP.cfm. Park and ride programs are being developed under the LAX Master Plan Mitigation Plan for Air Quality (MPAQ), as well as developing additional dedicated bus service to LAX from key locations in Southern California (the LAX Flyaway program). (See LAX Master Plan MMRP, pages 42-47.) Additional park and ride measures are therefore not needed as part of the CUP-RP. Additionally, it would be infeasible to develop park and ride facilities specifically for the CUP-RP because it would be costly to acquire land for parking facilities near construction workers' residences, even if those residences were clustered geographically. Moreover, NOx impacts from operation of the CUP-RP would be less than significant; therefore, mitigation measures to address NOx emissions need not be incorporated in the CUP-RP for operations (CEQA Guidelines, § 15126.4 (a)(3)). Although park and ride programs will not be developed specifically for the CUP-RP, the LAX Flyaway program currently includes stations at Van Nuys Airport, Union Station, and Westwood, with a fourth station approved for the Irvine Transportation Center. Construction workers living near these stations could potentially use the Flyaway buses to commute to and from LAX.

Regarding the seventh measure listed in the comment under "NOx", traffic signals on-airport are already synchronized to promote traffic flow through the CTA. In addition, the CUP-RP Draft EIR identifies several provisions related to improving traffic flow by signal synchronization. For example, LAX Master Plan Commitment ST-17 (Maintenance of Haul Routes), included in Table 1-1 on page 1-8 of the CUP-RP Draft EIR, provides that "signal phasing modifications will be provided as needed," and Commitment C-1, cited above, also requires an analysis of traffic conditions to determine the need for additional signal modifications.

Regarding the eighth measure listed in the comment under "NOx", in addition to promoting ridesharing and commuting during off-peak hours, as mentioned above, LAX Master Plan Commitment ST-18 (Construction Traffic Management Plan), included in Table 1-1 on page 1-8 of the CUP-RP Draft EIR, which requires development of a complete construction traffic plan that addresses construction employee parking. Therefore, traffic interference would be minimized under measures already included as part of the CUP-RP.

The three measures suggested to reduce fugitive dust are also already included as part of the CUP-RP. The first measure listed in the comment under "Fugitive Dust" is equivalent to strategies suggested in SCAQMD Rule 403. It is LAWA policy not to list compliance with existing rules as mitigation measures under CEQA. However, LAWA will comply with SCAQMD Rules during construction of the CUP-RP.

The second measure listed in the comment above under "Fugitive Dust" is embodied in a component of LAX Master Plan Mitigation Measure MM-AQ-2. As listed in Table 1-1, on page 1-9 and in Table 4.2-10, on page 4-76 of the CUP-RP Draft EIR, LAWA will require a publicly visible sign be posted with the name and telephone number of a person to contact regarding dust complaints, who will respond and take corrective action within 24 hours.

The third measure listed under "Fugitive Dust" is mandatory under SCAQMD Rules 1186 and 1186.1. As explained above, compliance with these rules will not be included as mitigation measures under CEQA. However, LAWA will comply with Rules 1186 and 1186.1 when sweeping streets to remove visible soil materials.

Regarding the first measure listed in the comment under "VOC", the CUP-RP is primarily an industrial project, and painting will be required to meet specific performance standards, such as for safety (visibility) or to inhibit corrosion. Therefore, it is infeasible to implement this measure. The other measure listed in the comment under "VOC" is infeasible to implement for a majority of the project and would not clearly yield an environmental benefit. As the CUP-RP is primarily an industrial facility, there will be relatively little finished space (offices, control room, etc.) requiring construction materials that are available pre-painted (trim, woodwork, flooring, etc.). In addition, unless such construction materials are pre-painted in a controlled environment, VOCs are released to the atmosphere whether painted on-site or off-site.

The webpage at the URL http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html (accessed on October 1, 2009) provides six categories of mitigation measure suggestions: off-road engines, on-road engines, harbor craft, ocean going vessels, locomotives, and fugitive dust. Three of these categories, harbor craft, ocean going vessels, and locomotives, do not apply to the CUP-RP project. However, portions of the off-road engines, on-road engines, and fugitive dust categories are applicable to the CUP-RP. The off-road engine measures involve repowering vehicles with newer model year engines, or with engines of different tiers, or retrofitting with filters or energy storage devices. The off-road engine measures listed by SCAQMD include diesel particulate

filters for generators, and the CUP-RP would involve one diesel-powered 250 kilowatt (KW) standby generator. The LAX Master Plan CBA commitment adopted as part of the CUP-RP requires use of the "best available emission control devices" to reduce particulate matter and NOx emissions from "stationary diesel engines (such as generators)." It requires all diesel equipment, both on-road and off-road, to be outfitted with the best available emission control devices verified or certified by either CARB or EPA (CUP-RP Draft EIR, § 4.2.5.). These requirements have been incorporated into the CUP-RP as outlined in MM-AQ-2 on pages 4-75 though 4-77 of the CUP-RP Draft EIR. There are no other stationary engines contemplated in the CUP-RP to which the SCAQMD measures would apply. Therefore, the engine-related measures listed on SCAQMD Tables I, II, III, and IV accessed via the webpage need not be applied to the CUP-RP.

The fugitive dust measures provided via the SCAQMD webpage fall into five sub-categories: construction & demolition (Table XI-A), materials handling (Table XI-B), paved roads (Table XI-C), unpaved roads (Table XI-D), and storage piles (Table XI-E). The mitigation measures in the SCAQMD tables would either not be applicable to the CUP-RP or would already be achieved by existing mitigation measures. LAX Master Plan Mitigation Measure MM-AQ-2 requires installed roadways to be paved as soon as possible and requires construction access roads to be paved at least 100 feet into the construction site. Since mitigation of PM10 from unpaved roads is already included in the CUP-RP mitigation measures for unpaved roads in Table XI-D need not be adopted. The CUP-RP does not involve development of roadways; therefore, Table XI-C, which includes mitigation measures for paved roads, is not applicable to the CUP-RP.

SCAQMD Table XI-B, for the materials handling sub-category, presents measures for conveyor transfer points, disturbed and undisturbed construction areas, and storage piles. Conveyor transfer points are not anticipated as part of the CUP-RP; therefore, the SCAQMD measure for this source is not applicable to the CUP-RP. Providing trees as windbreaks on the airport is infeasible due to the congested location of the project site – which is surrounded by man-made windbreaks in the form of parking structures and the FAA control tower. Since any disturbed portion of the CUP-RP site will be paved or enclosed in a building, planting ground cover on disturbed areas is not feasible. The SCAQMD storage pile measures involve using three-sided windscreens and watering or covering the pile during high wind events. These measures would not effectively reduce impacts beyond what has already been included as part of the CUP-RP Draft EIR. Mitigation Measure MM-AQ-2 is an equivalent or better control and is already incorporated in the CUP-RP. MM-AQ-2 (Measure 1b) states: "Following the addition of materials to, or removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing non-toxic soil stabilizer."

The remaining fugitive dust sub-category is construction & demolition. These measures are either already included in the CUP-RP or are not appropriate or feasible. Four of the measures listed in the SCAQMD construction & demolition table (Table XI-A) involve applying water at construction sites: Active demolition and debris removal; Post-demolition stabilization; Demolition Activities; and Construction Activities. These measures need not be incorporated into the CUP-RP because the CUP-RP already includes equivalent measures. The CUP-RP will comply with all applicable watering requirements listed in SCAQMD Rule 403. (See Table 4.2-9 on page 4-76 of the CUP-RP Draft EIR.) Additionally, LAX Master Plan Mitigation Measure MM-AQ-2, which is incorporated into the CUP-RP, requires the use of non-toxic soil stabilizer to be sprayed on disturbed areas and watering of disturbed soils that cannot be stabilized using non-

toxic soil stabilizers or dust suppressants, as specified by the SCAQMD Rule 403 implementation handbook.[1]

The CUP-RP includes equivalent or substantially equivalent grading (6 inches versus 12 inches of freeboard, for example) measures as those provided in SCAQMD Table XI-A. The trackout measure is not applicable to the CUP-RP because, as noted above, construction access roads would be paved and there would be no unpaved truck exit routes. The SCAQMD construction traffic measure, limiting vehicle speeds on unpaved roads to 15 miles per hour (mph) via radar enforcement, is similarly not applicable to the CUP-RP, because no unpaved roads where such speeds might be effective would be part of the CUP-RP. The scraper loading and unloading would not provide appreciable control because the CUP-RP construction site is relatively compact and very little, if any, soil would be handled by scraper.

The final measure listed in SCAQMD Table XI-A for prohibiting demolition activities when wind speeds exceed 25 mph is derived from an analysis prepared for the San Joaquin Valley Air Pollution Control District (SJVAPCD) that considered the measure as one way to meet the requirement of an SJVAPCD rule that the opacity of visible dust plumes be limited to 20 percent.[2] The LAX CUP-RP would adhere to SCAQMD's Rule 401 regarding visible emissions. Moreover, demolition activities would account for only a small fraction of PM10 emissions during implementation of the CUP-RP. Demolition activities would be scheduled to occur on 162 days out of 1,000 construction days. The day during demolition with the most PM10 emissions would have 3.49 pounds of PM10 emissions from demolition (the maximum daily PM10 emissions from demolition) and 73.17 pounds of PM10 from all sources, so demolition would contribute only 4.8 percent of PM10 emissions on that day. This shows that focusing on demolition with such a measure that would only apply during high wind conditions would not be effective or worthwhile in providing emission reductions. In fact, the analysis prepared for the SJVAPCD found that the cost of the measure would be $847,000 per ton of PM10 emissions reduced, well above a cost-effectiveness ratio threshold for economic infeasibility. For all of these reasons, this measure need not be incorporated in the LAX-CUP.

CUP-AR00002-6

Comment In addition to the above NOx measures, SCAQMD staff recommends modifying the following existing mitigation measures included in Table 4.2-10 as follows.

- Prohibit construction vehicle and engine idling in excess of ~~ten~~ five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,

- Specify ~~combination of~~ conditions for electricity service from power poles ~~and portable diesel or gasoline fueled generators using "clean burning diesel" fuel and exhaust emission controls~~ for electrification of service equipment and auxiliary power units at the facility,

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1 Los Angeles World Airports, LAX Master Plan - Mitigation Plan for Air Quality (MPAQ) - MM-AQ-2: Construction-Related Mitigation Measures, prepared by URS Corp. & KB Environmental Sciences, Inc., October 2005, p. 11.

2 San Joaquin Valley Unified Air Pollution Control District, Final BACM Technological and Economic Feasibility Analysis, prepared by Sierra Research, March 21, 2003.

- Reroute construction trucks vehicles away from congested streets and prohibit staging and parking of construction vehicles (including workers' vehicles) on streets adjacent to all sensitive receptors such as schools, day care centers and hospitals.

Response: Table 4.2-10 of the CUP-RP Draft EIR identifies measures from the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) that would also be implemented as part of the CUP-RP. Wording of these measures is derived directly from the LAX Master Plan MMRP. Subsequent to adoption of the LAX Master Plan MMRP, SCAQMD adopted Rule 2449, which revised allowable construction vehicle and engine idling times. To ensure that LAWA complies with SCAQMD rules, Table 4.2-10 of the CUP-RP Draft EIR has been revised to incorporate the suggested modifications to the first bullet of this comment. Please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR. In addition, analogous language in the LAX Master Plan MMRP will be revised as part of the 2009 Annual Progress Report.

The mitigation measure related to pole power has also been modified, with a slight variation in the wording suggested in the comment. The variation in wording, as presented below, is intended to provide for clean burning diesel fuel and emission control on auxiliary power units when pole power is not available or feasible. Such circumstances could include construction in areas not served by power poles, in areas where physical or logistical constraints exist that make use of existing electricity infrastructure infeasible, or where the duration of the power requirements is short and obtaining the necessary authorization to obtain electricity service from power poles is not practicable.

- Specify ~~combination of~~ *conditions for* electricity *service* from power poles ~~and portable diesel or gasoline fueled generators using "clean burning diesel" fuel and exhaust emission controls~~ *for electrification of service equipment and auxiliary power units at the facility, Auxiliary power units, such as portable diesel or gasoline fueled generators, shall use "clean burning diesel" (i.e., low sulfur) and exhaust emission controls as feasible and appropriate.*

Please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR, for the modification associated with this mitigation measure. In addition, analogous language in the LAX Master Plan MMRP will be revised as part of the 2009 Annual Progress Report.

Regarding the suggested wording for the third mitigation measure, such modification is not necessary given that construction staging and parking is proposed to occur within the CTA away from sensitive receptors and there are existing LAX Master Plan commitments and mitigation measures that help minimize truck travel during congested conditions. These measures, which LAWA has proposed to implement for the CUP-RP, are identified in Section 4.1.7 of the CUP-RP Draft EIR, and include the following:

- Commitment C-1 includes a provision to establish and monitor delivery times and routes
- Commitment ST-2 limits deliveries to CTA projects to non-peak traffic hours whenever possible
- Commitment ST-9 requires coordination of construction deliveries with traffic detour plans

- Commitment ST-12 encourages night-time construction deliveries and requires that deliveries during peak periods (i.e., 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m. Mondays through Fridays) be avoided
- Commitment ST-14 establishes non-peak construction employee shift hours
- Commitment ST-16 provides for the establishment of haul routes away from sensitive noise receptors
- Commitment ST-18 requires the development of a construction traffic management plan, including coordination of construction deliveries
- Commitment ST-22 requires establishment of designated truck routes that avoid residential streets

CUP-PC00001	**Schneider, Denny**	**Alliance for a Regional Solution to Airport Congestion (ARSAC)**	**9/14/2009**

CUP-PC00001-1

Comment: ARSAC is pleased that LAWA has identified the need for improvements and upgrades to the Central Utilities Plant that was built in the 1960s and modified in the 1980s. Since the physical location is within the Central Terminal Area we expect limited long term impacts on the surrounding communities and trust that the construction scheduling and routing will minimize impacts as well. We agree with LAWA that the project option ultimately chosen should be that which emphasizes sustainability, reliability and maintainability since these costs, in the long run, will far exceed the initial construction cost.

Response: The comment is noted. The replacement CUP, if approved, would be state of the art, and a prudent investment. In addition, as indicated throughout the CUP-RP Draft EIR, the CUP-RP incorporates LAX Master Plan commitments and mitigation measures to minimize adverse impacts to the surrounding communities during construction.

CUP-PC00001-2

Comment: We are pleased to see that LAWA stated in the EIR introduction that, "Staging for construction equipment, as well as construction worker parking, would be located in surface parking lots within the CTA." We understand that LAWA has discarded plans for any use of parking accesses along the northern boundary, Westchester Parkway, including areas behind the existing Westchester Business District. If our understanding has changed, please note our unequivocal objections and we ask that you specify what your new plans are before project approval.

Response: As indicated by the commenter and as noted in Section 2.5 of the CUP-RP Draft EIR, all construction staging and parking associated with construction of the new CUP would be located within the Central Terminal Area (CTA). The CUP-RP construction would not use any construction staging areas in the northern portion of the airport off of Westchester Parkway. However, for purposes of evaluating cumulative construction-related surface transportation impacts, construction staging locations for other airport-related construction projects were considered in the CUP-RP surface transportation analysis. At

the time of the preparation of the CUP-RP Draft EIR, the Northwest Construction Staging Area located south of Westchester Parkway and east of Pershing Drive was proposed as a primary construction staging and parking area for the Bradley West Project, and is shown as such in Figure 4.1-6 of the CUP-RP Draft EIR. On September 21, 2009, the Board of Airport Commissioners approved the Bradley West Project as modified by Alternative 4, under which the Bradley West Project West Construction Staging Area, located south of World Way West and east of Pershing Drive, will be reconfigured to create space for primary contractor employee parking. Under the Bradley West Project as approved, the Northwest Construction Staging Area will continue to be used for construction offices, as well as construction laydown and staging; however, this location is no longer proposed to be a primary contractor employee parking area. Figure 4.1-6 of the CUP-RP EIR has been revised to reflect this. Please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR. Analysis was conducted as part of the Bradley West Project Final EIR to evaluate the potential for the refined Alternative 4 to result in surface transportation impacts, including cumulative impacts. This analysis found that use of the West Construction Staging Area as the primary contractor employee parking area for the Bradley West Project would result in the same significant construction traffic-related impacts that were identified in the Bradley West Project Draft EIR. Specifically, the intersection of Imperial Highway and Main Street (#68) and the intersection of Imperial Highway and Pershing Drive (#69) would be significantly impacted. The Board of Airport Commissioners adopted a mitigation program for the Bradley West Project that would mitigate significant construction-related impacts at these two intersections. These potential mitigation measures are described in detail within Section 4.3.9 of the Bradley West Project Draft EIR. The proposed mitigation measures defined in the Bradley West Project Draft EIR would mitigate, to a less-than-significant level, the impacts associated with Bradley West Project primary contractor employee parking occurring at the West Construction Staging Area rather than at the Northwest Construction Staging/Parking Area. See Bradley West Project Final EIR Chapter 2, Section 2.1, Topical Response TR-BWP-ST-1, available at http://www.ourlax.org/docs/LAXBradleyWestProject FEIRVolume8(2).pdf.

The staging area located further east along Westchester Parkway and west of the Westchester Business District (Area C in Figure 4.1-6) is now, and has been for many years, used for airport construction staging and storage. The site is separated from nearby residences by La Tijera Boulevard and is screened from view with fencing and landscaping. Access to the site is from the south along Westchester Parkway. As indicated in Figure 4.1-6 of the CUP-RP Draft EIR, this area will not be used for CUP-RP construction staging activities. The CUP-RP Draft EIR traffic analysis accounted for the continued use of this area for the residential soundproofing program and other LAX projects, such as the Airport Taxiway/Taxilane/Service Road Improvement Project, within the context of cumulative traffic conditions. No actual construction activity associated with the CUP-RP is planned to be conducted in this staging area, nor is general contractor employee parking proposed.

CUP-PC00001-3

Comment: Several questions arise as to the scope of the project:

How close will the new CTA building site be located to the FAA Control Tower? What were the results of the safety and security assessment since the current site is in close proximity to the tower.

Response: As stated on page 2-2 and as depicted in Figure 2-3 on page 2-7 in Chapter 2 of the CUP-RP Draft EIR, the Air Traffic Control Tower is located approximately 25 to 30 feet to the east of the proposed CUP-RP site. The impact of the project with respect to hazards and hazardous materials would be less than significant. (See CUP-RP Draft EIR Section 5.5 and Appendix A, CUP-RP Initial Study, Attachment A, Section VII, pages a-16 through A-20.) Potential hazards associated with the CUP-RP would be similar to and would not represent a substantial change from existing operations at the CUP. As discussed in the Initial Study, the types of chemicals and quantities handled would be similar to existing conditions and operation of the CUP would continue to be highly regulated to prevent incidents and accidents. The CUP would continue to operate in compliance with all relevant federal, state and local safety and security regulations to minimize risks, including risks to the Air Traffic Control Tower. Preventive measures that would continue to be incorporated into operation of the replacement CUP include engineered failsafe and back-up systems, handling practices, equipment start-up and shut-down procedures, sulfuric acid detection and monitoring, maintenance and employee training programs, emergency response procedures, and auditing and inspection programs. The slight shift in the location of the proposed replacement CUP, compared to the location of the existing CUP, would not change the applicability of existing safety practices, procedures, and requirements and would not result in a significant impact regarding hazards.

CUP-PC00001-4

Comment: The EIR lists several utility service upgrades based on current and already approved structure needs. Does this mean that electrical, water, and heating/cooling service will be adequate to enclose the entire CTA area as depicted in the approved Alternative D Master Plan currently occupied by CTA parking lots? What extra allocation of utility needs are projected to accommodate new technologies (i.e. in the 1980s there was little though about the computer access capacity?).

Response: The CUP-RP would produce hot water and chilled water to facilitate space heating and cooling within terminal areas. The proposed facility also includes a cogeneration facility that would generate electricity in conjunction with the heating of water. Cogenerated electricity would be used to offset the electrical load required to power the chillers and may provide some energy that would feed back into the Los Angeles Department of Water and Power electrical grid. The CUP-RP would not provide any electrical or water utilities to the Central Terminal Area (CTA) buildings. However, as discussed in Final EIR Section 3.2 ("Corrections and Additions to the Draft EIR Text"), in conjunction with the placement of new chilled and hot water pipelines, other utility lines of a linear nature, such as new electrical and communication duct banks, new reclaimed water pipelines, new potable water pipelines, and new fire water pipelines, would be co-located with the Utilidor/trench. While technologies such as computers may affect electrical loads, there are no reasonably foreseeable similar technologies that would materially increase the amount of heating and cooling required within the existing CTA buildings such that extra capacity would be required. If anything, recent technologies, such as the use of modern building materials and the implementation of sustainable building practices, may lower the demand for heating and cooling within the terminal areas. The CUP-RP was sized to accommodate both existing and anticipated demand for heating and cooling within the CTA. For additional details on existing heating and cooling capacity, please see CUP-RP Draft EIR Section 2.1. For additional details on the proposed project's heating and cooling capacity, please see CUP-RP Draft EIR Section 2.4.

CUP-PC00001-5

Comment: What redundancy has been built into the designs? Can power to one terminal or building impact other facilities? If water is suspended to one building will others be impacted? If grey water is to be used (and we encourage it for permitted uses), will separate routing to buildings be enacted or will the pipes be in series risking multiple locations? Is the fire hydrant system separate from other water sources? Can grey water be used for fire suppression?

Response: The CUP provides chilled and hot water to heat and cool CTA facilities. CTA facilities are not dependent upon the CUP to meet their electricity demands. Backup systems are provided in the design of the replacement CUP to allow continuous heating and cooling service during temporary repairs or power outages. The cooling system has been designed with a redundant chiller to allow temporary repair of any unit. All pumps for the chilled and hot water systems have been designed with a spare pump. In the event of a loss of power at the replacement CUP, a 250kW diesel generator would provide backup power to all emergency lighting and power circuits, including the Control room servers, fire alarm, Uninterruptable Power System (UPS) systems, Facility Monitoring and Control System (FMCS), and communications systems.

Any interruption of water that serves one building (via a branch pipe off the main distribution) would not significantly impact any other facility. The intent of the pipeline design is to provide valve boxes within the CTA that can separate and provide individual services to each building or to portions of the pipe distribution that could be damaged or disrupted. All terminals and facilities would be supplied with chilled and hot water through the new CUP, although some terminals are "reconnected" to the distribution system through existing piping. Branch piping that currently serves Terminal 6 through Terminal 7 is an existing condition and, as such, would have no environmental consequence with respect to the development of the new main pipeline system or the replacement CUP.

As discussed on page 2-2 in Chapter 2, Project Description, of the CUP-RP Draft EIR, recycled/reclaimed water originating at the West Basin Municipal Water District's Water Recycling Facility (West Basin Water Recycling Facility) in El Segundo is proposed for use in the replacement CUP's new cooling tower system after it has been treated to reduce the corrosiveness of the water and to prevent water odors (refer to Section 2.2, page 2-2, of the CUP-RP Draft EIR). The treated recycled/reclaimed water proposed for use in the cooling towers would not mix with water for the chilled and hot water utility lines or the underground thermal storage tank (TES). The recycled/reclaimed water system for the CUP-RP is independent from, and as proposed would not be feasible for use as a water supply for, the airport's fire hydrants and fire suppression systems and would not reduce or avoid significant impacts of the proposed project (See Table 1-1 of the CUP-RP Draft EIR which summarizes significant air quality, human health risk, and global climate change impacts). The treated recycled water is used as makeup water for the cooling towers. The treated water is produced by a process which filters and softens the water so as to reduce the blowdown at the new CUP. The water is processed and expensive to produce (i.e., operating cost of water treatment plant) and would not be available in the CTA at sufficient quantities or pressures that could be used by a fire water system. In addition, the current fire water system is comingled with the potable domestic water currently serving the CUP. Therefore, non-potable water cannot be added into the CTA's drinking water system.

CUP-PC00001-6

Comment: Assuming utilidors are chosen as the preferred implementation option, will they be enacted for use to all facilities supplied instead of the limited number shown in EIR drawings?

Response: The Utilidor in the general alignment shown in Figure 2-7 on page 2-21 in Section 2.4.5 of the CUP-RP Draft EIR would serve the same terminals and facilities currently served by the existing CUP. These include Terminals 1, 2, 3, 4, 5, 6, 7 and 8, Tom Bradley International Terminal, the Theme Building and Administration East. Figure 2-7 in the Draft EIR does not show a utilidor connection to Terminal 6 because hot water and chilled water for that terminal are supplied through pipes that extend from Terminal 7 (i.e., the utilidor connection to Terminal 7 would provide hot water and chilled water for both Terminals 6 and 7). Please also see Response to Comment CUP-PC00002-6.

CUP-PC00001-7

Comment: How might the use of water treatment site one impede future LAX expansion east? In what way would water treatment site two at Jenny/96th street impact the potential rights of way for light rail? If the purpose of the water treatment is to render water from the West Basin District usable for replenishment of cooling systems, can treated water be brought directly from the El Segundo site to LAX instead of a separate treatment plant?

Response: As discussed in Section 5.5 of the CUP-RP Draft EIR, land use and planning Impacts were determined to be less than significant. For additional details on land use, see Initial Study Section IX, included in Appendix A of the CUP-RP Draft EIR.

The proposed reclaimed water treatment system would consist of modular equipment, including several tanks and/or cylinders, which would be connected to subsurface pipelines. As discussed in Section 2.4.8, pages 2-20 and 2-23, of the CUP-RP Draft EIR, the entire treatment facility, including the 3,000- to 6,000-square processing plant, 12-foot by 12-foot maintenance building, and two 8-foot diameter storage tanks would require a land area of approximately 14,000 square feet, which is substantially less than one acre in total. Both potential treatment sites are located within the area identified for use as a Consolidated Rent-A-Car (CONRAC) facility in the LAX Master Plan. Due to the compact nature of the treatment system, it could be located at either site without precluding use of the larger area for a CONRAC. Similarly, use of Potential Treatment Site 2 would not preclude use of adjacent rights-of-way for future light rail projects in the vicinity of LAX. Please also note that CEQA focuses upon impacts of a proposed project on the existing physical conditions in the affected area (see CEQA Guidelines Sections 15125 and 15126.2).

Please also refer to Response to Comment CUP-PC00001-5, above. As noted therein, the purpose of the recycled/reclaimed water treatment facility is to condition reclaimed water received from the West Basin Water Recycling Facility, which is located in El Segundo. This water does not require pretreatment for most end uses (e.g., landscape irrigation); however, pretreatment of water received from the West Basin Water Recycling Facility is required before it can be used in the new cooling towers because of the industrial nature of the CUP facility (i.e., the recycled/reclaimed water would be used within the CUP system, coming in contact with system components, and must be treated to avoid deleterious effects, such as corrosion, to those components). Under the proposed project, reclaimed water from the West Basin Water Recycling Facility would be transported via subsurface pipeline to the treatment system site. Following treatment, it

would be transported in a separate pipeline to the new CUP. There is not sufficient space adjacent to the new CUP for the proposed reclaimed water treatment system nor would such an alternative reduce or avoid the impacts of the proposed project. As indicated in Chapter 4 of the CUP-RP Draft EIR, construction of the reclaimed water treatment system would result in temporary construction-related traffic and air quality impacts. These impacts would be less than significant. The impacts would occur even if the treatment system were constructed adjacent to the new CUP. Instead of siting the reclaimed water treatment system next to the new CUP, two nearby potential sites have been identified for the location of this facility, as noted above. As water from the West Basin Water Recycling Facility must be pre-treated before use in the cooling towers, it cannot be received and used directly from the West Basin Water Recycling Facility.

CUP-PC00001-8

Comment: Since the existing pipes are of an age when asbestos was used what special provisions for handling have been established?

Response: The Hazardous Materials Survey performed for the project site identified the potential for asbestos and asbestos containing materials (ACM).[3] (See CUP-RP Draft EIR Section 5.5, and Appendix A, Initial Study Attachment A, pages A16 through A-17.) As discussed in the Initial Study, the handling and disposal of asbestos and other hazardous materials is strictly regulated by federal, state, and local laws. In Los Angeles County, federally-mandated procedures for the safe handling of ACM are set forth under SCAQMD Rule 1403. Rule 1403 requires that ACM be removed by certified asbestos containment contractors. Applicable legal requirements relating to ACM removal and related demolition activities also include advance notices to regulatory oversight agencies, extensive training for workers, and detailed requirements relating to the ongoing containment, management and disposal of the ACM. Compliance with these legal requirements for ACM abatement would ensure that workers or other receptors would not be exposed to any direct or airborne asbestos hazard. The Initial Study concluded that, with adherence to applicable health and safety regulations, potential impacts associated with hazardous materials, including asbestos, would be less than significant. With enforcement of applicable federal and state regulations, no additional special provisions for handling asbestos are required.

CUP-PC00001-9

Comment: Other questions include:

What separation of the air duct system is possible? If a contaminant is introduced in one area what measures are possible to be implemented to limit exposures?

Response: The proposed project does not involve changes to air duct systems within terminals. The new CUP would replace existing buried hot and chilled water service lines that serve the terminals and support their space heating and cooling needs. Changes to the air duct system are outside the scope of the CUP-RP and of this environmental review.

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[3] CTL Environmental Services, Hazardous Materials Survey, LAX Central Utilities Plant, Los Angeles, California, March 19, 2008.

CUP-PC00001-10

Comment: The Monitoring/Mitigation Plan states in MM-AQ-2 that areas will be paved to reduce fugitive dust "prior to final occupancy..." What will be done during construction to reduce this?

Response: As indicated on pages 4-74 and 4-75 in Section 4.2.5 of the CUP-RP Draft EIR, although the CUP-RP is not a component of the LAX Master Plan, LAWA is proposing that applicable commitments and mitigation measures identified in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) be implemented as part of the CUP-RP. As indicated in Section 4.2.5, LAX Master Plan Mitigation Measure MM-AQ-2, Construction-Related Measure, is applicable to the CUP-RP and will be included as part of the MMRP for the CUP-RP. LAX Master Plan Mitigation Measure MM-AQ-2 includes a number of requirements designed to reduce fugitive dust emissions during construction. Specifically, MM-AQ-2 identifies the following fugitive dust source controls:

- Apply non-toxic soil stabilizer to all inactive construction areas (i.e., areas with disturbed soil).
- Following the addition of materials to, or removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing non-toxic soil stabilizer.
- Post a publicly visible sign with the telephone number and person to contact regarding dust complaints; this person shall respond and take corrective action within 24 hours.
- Prior to final occupancy, the applicant demonstrates that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.
- All roadways, driveways, sidewalks, etc. being installed as part of project should be completed as soon as possible; in addition, building pads should be laid as soon as possible after grading.
- Pave all construction access roads at least 100 feet on to the site from the main road.[4]

The text on pages 4-75 through 4-77 of the CUP-RP Draft EIR provides a summary discussion of LAX Master Plan Mitigation Measures MM-AQ-1 and MM-AQ-2. The full text of LAX Master Plan Mitigation Measures MM-AQ-1 and MM-AQ-2 has been added to Section 4.2.5. Please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR.

CUP-PC00001-11

Comment: Given that most of the LAX landside and airsides have been subjected to significant amounts of toxic substances, what controls will be in place to monitor toxicity of the dust?

Response: It is possible that during construction activities for the CUP-RP, previously unidentified soil and/or perched groundwater contamination could be encountered. Worker health and safety and the environment would be protected to the maximum extent possible by strictly adhering to safety measures required by local, state, and federal laws and

[4] City of Los Angeles, Los Angeles World Airports, LAX Master Plan Alternative D Mitigation Monitoring and Reporting Program, September 2004.

regulations that govern contaminated materials encountered during construction. In addition, LAWA adopted the "Procedure for the Management of Contaminated Materials Encountered During Construction" ("Procedure") in 2005. The Procedure has provisions for, among other matters, preparing detailed plans for handling previously unknown areas of contaminated soil encountered and spills of hazardous materials that occur during construction, including provisions for preparing detailed health and safety and soils management plans, and for testing and segregating contaminated soils for proper disposal outside landfills. By following the Procedure, and adhering to safety measures required by local, state and federal law, potential environmental effects associated with encountering contaminated materials during grading, excavating and other construction activities for the CUP-RP would be less than significant.

Impacts related to fugitive dust emissions during construction were analyzed in Section 4.2 of the CUP-RP Draft EIR. Compliance with SCAQMD fugitive dust control requirements and the use of best available emission control devices to reduce diesel emissions would reduce construction peak daily emissions of PM10 and PM2.5 by 48 percent and 32 percent, respectively (see pages 4-78 and 4-79 of the CUP-RP Draft EIR). With the implementation of these measures, the SCAQMD peak daily thresholds would be not be exceeded for PM10 and PM2.5, and these impacts are therefore considered less than significant.

Toxic air contaminants were evaluated as part of the Human Health Risk Assessment, discussed in Section 4.3 of the CUP-RP Draft EIR. The analysis concluded that risks associated with the release of toxic air contaminants during and after the construction of the project would be less than significant after mitigation for all receptors, except the adult worker located approximately 120 meters downwind of the construction site in the Central Terminal Area (see pages 4-110 and 4-120 of the CUP-RP Draft EIR). Note, however, that to generate the adult worker cancer risk of 18 per million, one must assume that the CUP-RP construction continues for 40 years (not the 4 years anticipated), and the individual worker works in the CTA for the same 40 years.

CUP-PC00001-12

Comment: Similarly, since the areas under construction will be over one or more of the major sewer lines built before 1930 that crosses LAX to Hyperion, what effluent controls and monitoring will be in place?

Response: Regarding the proximity of the project to subsurface outfall sewers, the Central Outfall Sewer (COS) is located 100 feet or more west of the proposed CUP-RP site. Construction of the CUP-RP facility would have no impacts on the COS. However, replacement of chilled water and hot water service lines would occur directly above the COS. LAWA design contractors met with the City of Los Angeles Department of Public Works regarding potential constructability issues related to the proximity of the proposed lines to the COS. As a result of this coordination and in order to ensure that project construction does not affect the COS, the proposed project and the alternatives, including the Direct Burial Alternative incorporate design specifications for the water service lines with extensive notes that the contractor must comply with during construction. Per the specifications, the contractor would be required to obtain a permit from the City of Los Angeles Bureau of Engineering prior to working in the vicinity of the COS, thereby providing the Bureau the opportunity to review the construction plans prior to implementation. Among other specifications, the contractor would be required to inspect the sewer via closed circuit TV on three occasions: prior to construction; after installation of protective sheet piling, if needed; and after any installation of utilities. Furthermore, the

specifications indicate that the contractor would be responsible for any repairs that may be necessary as a result of construction activities. Finally, as is standard practice for LAWA projects within the airport that may affect City sewer main lines, extensive coordination will continue to take place with the City of Los Angeles Department of Public Works.

CUP-PC00001-13

Comment: Chapter Six talks about air quality issues and emphasizes monitoring PM10 and PM2.5 sized particles. LAWA has been the site of air quality studies showing that smaller, ultra-fine (PM0.1) particles do not always correlate with the larger ones. What monitoring or accommodation will be done for these smaller particles?

Response: The U.S. EPA finalized adoption of the first PM2.5 National Ambient Air Quality Standards (NAAQS) in July 1997, with clarifying amendments in July 2004. In January 2005, after at least three years of measuring and studying PM2.5 concentrations across the country, U.S. EPA designated the attainment status of each air district relative to PM2.5. At that time, the South Coast Air Basin (Basin), in which LAX is located, was designated as a non-attainment area for PM2.5. The State of California has also adopted state ambient air quality standards for PM2.5, and the Basin has been designated non-attainment for the state standards as well. The development of these standards was based on the impact of PM2.5 to human health and welfare, as determined by numerous studies over several decades. It should be noted that PM2.5 refers to particles with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers. Therefore, the term PM2.5 includes the smaller particles referred to by the commenter. Evaluation of information to more finely differentiate toxicological effects of different size fractions of PM has not to date led to development of ambient air quality standards for other PM fractions.

In addition, the SCAQMD had researched PM2.5 concentrations in the Basin and the relationship between PM2.5 emissions and potential air concentrations. Therefore, after the area was designated non-attainment, SCAQMD identified project-level PM2.5 emission rates and project-level PM2.5 concentrations that would be considered significant under CEQA. Currently, no California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) have been developed by CARB or USEPA for ultra-fine particulates (UFP, particles less than 0.1 micrometers in aerodynamic diameter), nor has SCAQMD developed significance thresholds for UFP emissions or concentrations within the context of CEQA. Therefore, no monitoring is proposed specifically for UFP as part of the CUP-RP.

Chapter 6 describes the results of emission and dispersion modeling for the Direct Burial Alternative carried forward for evaluation in the CUP-RP Draft EIR (estimates based on equations developed from other studies that are used in CARB and USEPA-approved models). The air quality impact analysis conducted for the CUP-RP Draft EIR studied emissions and resulting concentrations of all criteria air pollutants, including PM10 and PM2.5. The results are summarized in Section 4.2.6 (beginning on page 4-78) for the proposed project, and in Section 6.4.3.2 (beginning on page 6-10) for the Direct Burial Alternative. Detailed calculation tables are presented in Appendix C of the CUP-RP Draft EIR. Additional studies of PM10 and PM2.5 for this project are not necessary.

Parallel to air quality evaluations conducted for the CUP-RP, LAWA is currently conducting an Air Quality Source Apportionment Study that will monitor and analyze UFP emanating from airport sources, as well as other sources in the vicinity of the airport.

CUP-PC00001-14

Comment: In the early 2000's LAX was the site of a fuel cell electricity generating experiment. Was it in the area of the new CUP and is it a viable supplement?

What alternative power sources have been considered to support the CUP? What solar power generation has been considered and where? Has alternative power sources been planned in case of a failure of a power substation?

Response: The use of fuel cells would not be feasible as part of the CUP-RP, due to size constraints and energy inefficiency. The space required to generate 9 megawatts (MW) of power using fuel cell power generation units would exceed the space available for the new CUP-RP. In addition, fuel cell technology would fail to capture the energy efficiency of co-generation, which allows for combining steam and power production.

Solar power is currently under consideration as an alternative energy source for other LAX projects, but not for the CUP-RP. Solar power generation at LAX is constrained by the amount of available space suitable for photovoltaic cells operation. To generate 9 MW of power, approximately 30 acres of space would be needed for solar photovoltaic panels, which is not available at the CUP-RP site. Furthermore, photovoltaic cells would fail to capture the energy efficiency of co-generation, which allows for combining steam and power production. In addition, as stated in Section 2.4, page 2-11, and Section 4.4.8, page 4-146 of the CUP-RP Draft EIR, LAWA is considering the use of biogas from the Hyperion Treatment Plant as an alternative energy source for use in the replacement CUP. Regarding potential power failures, see Responses to Comments CUP-PC00001-5 and CUP-PC00002-5.

CUP-PC00002 Dragone, John Los Angeles International Airport Area Advisory Committee 9/11/2009

CUP-PC00002-1

Comment: The members of the LAX Area Advisory Committee (LAXAAC) favor the construction of the proposed Central Utility Plant replacement project (CUP-RP), as we believe it is important for LAWA to update the electrical system and heating and cooling facilities at LAX.

Response: The comment is noted. The comment does not raise an issue regarding the contents or adequacy of the Draft EIR and thus, does not require further response.

CUP-PC00002-2

Comment: As airport neighbors, we are encouraged by the expected improvements to environmental quality projected once the new plant is operational. Nonetheless, we are concerned about the insufficient plans to mitigate the environmental impacts from the CUP construction. Although the Draft EIR proposes to require construction measures to mitigate air pollution, noise, dust, hours of operation, construction workers' parking and transportation, and disturbance for neighboring communities, the Draft EIR explicitly recognizes that these measures will be inadequate. Moreover, the measures are stated as generalities and the methods and procedures designed to ensure compliance with these directives are not clear.

Response: As summarized in the Table 1-1 and Section 5.1 of the CUP-RP Draft EIR, the Draft EIR concludes there would only be significant and unavoidable impacts for air quality, human health risk, and global climate change. All other impacts were determined to be less than significant. For more detailed analysis please see Draft EIR Chapters 4 and 5.

Regarding the concern that plans to mitigate environmental impacts from CUP-RP construction are insufficient, it should be noted that feasible mitigation measures are required under the California Environmental Quality Act (CEQA) for impacts determined to be significant (See CEQA Guidelines Sections 15041 and 15126.4). Impacts associated with construction workers' parking and transportation, as evaluated in Section 4.1, Construction Surface Transportation, of the Draft EIR, were not identified as significant. Nonetheless, the CUP-RP Draft EIR includes ten Master Plan commitments associated with ground transportation and parking. Applicable ground transportation commitments and mitigation measures are listed in Section 4.1.7, pages 4-42 through 4-44, of the CUP-RP Draft EIR. These commitments and measures will also be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the CUP-RP.

As indicated in Section 5.5 and Appendix A (Attachment A of the CUP-RP Initial Study) of the CUP-RP Draft EIR, noise impacts associated with the project were not identified as significant in large part because proposed construction activities would be more than 4,500 feet away from the nearest noise sensitive uses in El Segundo and Westchester. Furthermore, construction staging areas for the project would be located within the Central Terminal Area and construction vehicles would be directed away from sensitive receptors, such as residences, with implementation of LAX Master Plan Commitment ST-16. As further discussed in the Initial Study, noise levels associated with the installation of the recycled/reclaimed water pipeline and treatment facility would be comparable to, or less than, those identified with general outdoor construction (i.e., 86 dBA Leq at 50 feet), but would be shorter term and transient in nature compared to those associated with construction of the replacement CUP and, as such, were determined to be less than significant. Therefore, no further evaluation of noise impacts associated with the CUP-RP was included in Chapter 4 of the CUP-RP Draft EIR. Since the completion of the Initial Study, Potential Treatment Site 3, located near Westchester Parkway (Initial Study Figure 5), was removed as an option in the Draft EIR (See also Response to Comment CUP-AR00002-2). With the deletion of the prior option, the pipeline would run from West Basin Municipal Water District's existing recycled water line at the 96th Street and Jenny Avenue to one of the two potential treatment sites, and from the selected treatment site to the replacement CUP. The connection to West Basin's existing recycled water line and the future treatment site are located within the airport property on 96th Street at, or west of, Jenny Avenue, which is more than 2,600 feet from the nearest sensitive receptor locations in Westchester. At this distance, maximum noise levels would be reduced by approximately 25 dBA (a 4.5 dBA reduction with each doubling of distance), to approximately 65 dBA. As 65 dBA is well below the ambient noise level of approximately 70 dBA CNEL at the nearest noise sensitive receptor sites, noise impacts associated with the recycled water facility and lines would remain less than significant.

The Draft EIR does identify construction air pollutant emissions as a health impact that would be significant to on-site receptors, even with implementation of all feasible mitigation measures. As further described below, while the Draft EIR indicates that certain impacts would remain significant after implementation of mitigation measures, it does not state that proposed mitigation measures are inadequate.

Significant air quality, human health, and global climate change impacts are addressed through implementation of all feasible mitigation measures, including applicable LAX

Master Plan mitigation measures and the use of Best Available Emission Control Devices. LAX Master Plan mitigation measures that also address the project's air quality, human health, and global climate change impacts are specifically listed in Tables 4.2-9 and 4.2-10 in Section 4.2.5, on pages 4-76 through 4-77 of the CUP-RP Draft EIR and will be included in the MMRP for the CUP-RP. Applicable LAX Master Plan mitigation measures would be implemented in accordance with the Construction Mitigation Measures component of the LAX Master Plan-Mitigation Plan for Air Quality, as set forth in Mitigation Measures MM-AQ-1 and MM-AQ-2. As discussed in Section 4.2.5, page 4-77 of the CUP-RP Draft EIR, emissions would be further reduced through required Best Available Emission Control Devices that must be certified by CARB or SCAQMD.

No specifics are provided in the comment regarding why proposed mitigation measures are considered too general and unclear. The mitigation measures proposed in Sections 4.2.5 and 4.3.5 of the CUP-RP Draft EIR are specific enough to achieve their intended results. Furthermore, the MMRP for the CUP-RP will identify each significant impact, the number and title of each Master Plan commitment and/or mitigation measure that would be applicable to the project, the full text of the subject Master Plan commitment or mitigation measure, the impact being addressed, the timing of implementation, monitoring frequency, and actions indicating compliance (See CEQA Guidelines Section 15097). The enforcement of the CUP-RP's MMRP is required under CEQA and would ensure compliance with applicable commitments and mitigation measures. Please also see Response to Comment CUP-PC00001-10 which provides additional detail on LAX Master Plan Mitigation Measure MM-AQ-2.

CUP-PC00002-3

Comment: We are particularly concerned the construction project would create significant air pollution for residents of communities near the airport, and would not be adequately mitigated by the proposed mitigation measures. The levels of PM10 are indicated as "significant" during the construction process (see page 4-84) and the significant levels of these pollutants as well as others (volatile organic compounds and nitrogen oxides) are "unavoidable" during construction (page 1-9). Given these findings, we believe that additional mitigation measures must be incorporated during construction, so that the project-related cancer risks are diminished. Otherwise, you are simply trading increased cancer levels in the surrounding communities for energy efficiency at the airport. Despite our belief in the goal of energy efficiency, we are not willing to accept that trade.

In addition, the Draft EIR does not adequately account for all of the potential health effects of such pollution. For example, the high incidence of asthma in communities adjacent to the airport is not discussed in the Draft EIR. Current air pollution studies have shown that particles smaller than PM2.5 can cause serious lung damage and that particulate matter larger than the PM10 level can settle in the bronchial tubes and lungs and cause health problems. We also are concerned that the project's effects on air pollution are not examined thoroughly enough, particularly because the Draft EIR did not address particulate matter smaller than the PM2.5 level. Inasmuch as technology is now available to look at this smaller particulate matter, we believe LAX should do so.

Response: The commenter's concern regarding air pollution associated with the proposed project is noted. These concerns are directly addressed in the CUP-RP Draft EIR and below.

The conclusion in Section 4.2.6.2 for significant PM10 levels during construction relates to a Central Terminal Area receptor "in the center of the airport's gates and passenger parking area" (refer to page 4-84 of the CUP-RP Draft EIR) and not to any impact on

communities near the airport. As concluded in Section 4.2.6.2 of the Draft EIR, PM10 concentration results for all other modeled receptors, including fenceline receptors and all of the community sites, did not exceed the significance thresholds.

The significance of volatile organic compounds (VOC) and nitrogen oxide (NO_x) emissions referenced in the comment relates to the overall regional burden of such emissions (in the entire South Coast Air Basin) and not to any localized impact on communities near the airport. As indicated in Table 4.2-18 of the Draft EIR, concentrations of NO_2 in the air during construction would not exceed the ambient air quality standards at any receptors, including those in surrounding communities. No NAAQS or CAAQS have been developed for VOC, therefore, concentrations for this pollutant are not calculated; however, concentrations have been estimated for certain individual organic compounds that are identified as toxic air contaminants by the State of California, and the health impacts of those concentrations are described in Section 4.3.

The comment is incorrect and unfounded in inferring that the project's construction-related air pollutant emissions would result in a significant cancer risk in the community. The comment's references to portions of the Draft EIR that indicate unavoidable significant impacts pertain to criteria pollutants, such as PM10, volatile organic compounds, and nitrogen oxides. Criteria pollutants are not direct indicators of cancer risk. Rather, some constituents of certain criteria pollutants, notably the diesel particulate matter fraction of PM10, contribute to cancer risk. These constituents are evaluated in the Human Health Risk Assessment in Section 4.3 of the CUP-RP Draft EIR. Project-related cancer risks are identified in Table 4.3-7 of the CUP-RP Draft EIR. As indicated in the table, significant cancer risks from construction would only occur for an adult worker located within the CTA. No significant cancer risks would occur in the surrounding communities during construction. Specifically, Section 4.3.6 (beginning on page 4-109) indicates that cancer risks at the LAX fenceline and at community sites during construction would be less than the SCAQMD significance threshold for cancer risk.

Further, cancer risks above the significance threshold for an adult worker is estimated by assuming that construction of the CUP-RP will last for 40 years, as required by applicable regulatory guidelines. In actuality, construction of the CUP-RP is anticipated to take only 4 years, and actual risks for workers would be an order of magnitude less than risks presented in Table 4.3-7 and well below the threshold of significance.

Following completion of the construction phase for the CUP-RP, cancer risks from operation of the new CUP would be less than significant, even for an adult worker in the CTA. In fact, cancer risks from operation of the new CUP for all off-airport receptors are predicted to actually decrease compared to existing conditions, resulting in a beneficial impact to surrounding communities.

A number of effective mitigation measures that were developed for the LAX Master Plan would be applied to the CUP-RP, as noted in Section 4.2.5 of the CUP-RP Draft EIR (beginning on page 4-74) and identified in Tables 4.2-9 and 4.2-10. These measures would reduce PM10 emissions by 48 percent below uncontrolled levels (See Draft EIR page 4-79). This reduction is notable because the major contributor to cancer risk is diesel particulate matter, which is responsible for an estimated 96 percent of the risk, as shown in risk calculations spreadsheets in Attachment 3 of Appendix C of the CUP-RP Draft EIR. For example, in Table 3-1A, the total cancer risk for residents is 2.2×10^{-6} and the cancer risk attributable to inhalation of diesel particulates is 2.1×10^{-6} or 96 percent of the total cancer risk. Furthermore, as noted on page 4-76 of the CUP-RP Draft EIR, some of the components of the construction mitigation program are not readily quantifiable (see Table 4.2-10 of the CUP-RP Draft EIR). Therefore, although LAWA

assumed that these measures would be implemented, no quantifiable credit was taken for emissions reductions associated with their implementation. In actuality, implementation of these measures is expected to further reduce construction-related emissions associated with the CUP-RP below the levels reported in the Draft EIR, and could result in lower cancer risks than reported.

The comment also states that "the Draft EIR does not adequately account for all of the potential health effects of such pollution. For example the high incidence of asthma in communities adjacent to the airport…" CEQA Guidelines state that "the description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives" (CEQA Guidelines Section 15125(a)). The Draft EIR acknowledges that exposure to air pollutants may result in a number of health related effects; however, assessment of air quality impacts and health risks cannot be used to link individual illnesses to past chemical exposures, nor can health risk assessments prove that a specific toxic substance caused an individual's illness[5]. Determining the cause of a current health problem or symptom is difficult. Many factors may influence if and how severely air pollution affects human health. For example, respiratory problems and cancer may be a result of workplace exposure, environmental exposure, or some other factor (e.g., personal habits such as smoking cigarettes). Further, air quality in the South Coast Air Basin is degraded by many TAC from a variety of sources, of which traffic is the largest and most important.

As discussed in Section 4.2.1.1 of the CUP-RP Draft EIR, ozone, PM10 and PM2.5 are in non-attainment in the South Coast Air Basin. Discussion of criteria pollutants on pages 4-53 and 4-54 of the CUP-RP Draft EIR specifically identify related health effects. For example, page 4-53 of the CUP-RP Draft EIR notes that "Scientific evidence indicates that ambient levels of ozone not only affect people with impaired respiratory systems (e.g., asthmatics), but also healthy children and adults. Ozone can cause health effects such as chest discomfort, coughing, nausea, respiratory tract and eye irritation, and decreased pulmonary functions" (See Draft EIR Section 4.2.1.1 page 4-53; see also Draft EIR Section 4.3.1). Potential health effects of other criteria air pollutants are also discussed in Section 4.2.1.1 of the CUP-RP Draft EIR. In addition, the Draft EIR provides information on recent trends in air pollutant concentrations and the attainment status for air quality pollutants (See Draft EIR Section 4.2.3).

The CUP-RP Draft EIR air quality analysis and health risk assessment evaluated potential adverse health effects associated with emissions from construction and future operation of the CUP-RP. The health risk assessment found that cancer risks and non-cancer health hazards were less than significance thresholds for adult and child residents and school children in the study area. Results of these evaluations cannot indicate whether a specific, observed health problem such as asthma was caused by a specific chemical exposure.

The health risk assessment prepared for the CUP-RP Draft EIR estimated health impacts for the maximally exposed individual (MEI), a hypothetical individual that lives, works, or goes to school at a location with the highest predicted concentrations of TAC in air, and who has other characteristics, such as inhalation rate and years of exposure, that result in maximum intake of TAC. In addition, toxicity criteria used in all the health risk assessment as well as ambient air quality criteria are developed to be protective of groups that may be exceptionally sensitive to a chemical, such as asthmatics, children and the elderly. The result is a conservative estimate of potential health impacts associated with CUP-RP.

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[5] California EPA. 2001. A Guide to Health Risk Assessment. Office of Environmental Health Hazard Assessment.

With regard to health effects of particles larger than PM10, it is not clear what studies are being referenced. Research on human health and exposure to particulate matter over the years has led to the current focus on smaller particles, primarily because particles with aerodynamic diameters greater than 10 micrometers do not penetrate effectively into the deep lung (alveoli) where they might deposit and remain for extended periods. Instead, these particles tend to deposit onto the mucus lining of the upper respiratory system and are removed from the lung in this mucus.

Over the last 20+ years, ambient air quality standards have been updated to reflect improving understanding of the toxicology of airborne particulate matter. The original ambient air quality standards for particulate matter, adopted in the early 1970s, were expressed in terms of "total suspended particulates" (TSP) which did not have a well defined upper or lower bound. In 1987, the TSP standards were replaced with the first PM10 standards (for particles with aerodynamic diameters less than or equal to 10 micrometers). In 1997, the first PM2.5 standards were adopted for particles with aerodynamic diameters less than or equal to 2.5 micrometers. In 2006, the peak daily PM2.5 standard was made more stringent, and the annual PM10 standard was revoked. Updates to ambient air quality standards necessary to protect public health with an adequate margin of safety have increasingly shifted focus to the toxicological effects of smaller particles within the size range of aerodynamic diameters known to penetrate to and deposit in the deep lung.

As noted above, the U.S. EPA finalized adoption of the first PM2.5 NAAQS in July 1997, with clarifying amendments in July 2004. In January 2005, after at least three years of measuring and studying PM2.5 concentrations across the country, U.S. EPA designated the attainment status of each air district relative to PM2.5. At that time, the South Coast Air Basin (Basin), in which LAX is located, was designated as a non-attainment area for PM2.5. The State of California has also adopted state ambient air quality standards for PM2.5, and the Basin has been designated non-attainment for the state standards as well. The development of these standards was based on the impact of PM2.5 to human health and welfare, as determined by numerous studies over several decades. It should be noted that PM2.5 refers to particles with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers. Therefore, the term PM2.5 includes the smaller particles referred to by the commenter. Evaluation of information to more finely differentiate toxicological effects of different size fractions of PM has not to date led to development of ambient air quality standards for other PM fractions.

In addition, the SCAQMD has researched PM2.5 concentrations in the Basin and the relationship between PM2.5 emissions and potential air concentrations. Therefore, after the area was designated non-attainment, SCAQMD identified project-level PM2.5 emission rates and project-level PM2.5 concentrations that would be considered significant under CEQA. It should be noted that these thresholds apply to each project that undergoes a CEQA review and analysis. The PM2.5 significance thresholds for emissions are included in Table 4.2-6, and those for concentrations are included in Table 4.2-7 (page 4-74) of the CUP-RP Draft EIR. No applicable standards currently exist for smaller ultra fine particles (UFP) within the context of a CEQA evaluation. UFP represents the size fraction of particles less than 0.1 micrometers in aerodynamic diameter.

The air quality impact analysis conducted for the CUP-RP Draft EIR studied emissions and resulting concentrations of all criteria air pollutants, including PM10 and PM2.5. The results are summarized in Section 4.2.6 (beginning on page 4-78), and detailed calculation tables are presented in Appendix C of the CUP-RP Draft EIR. Additional studies of particulate matter for this project are not necessary.

CUP-PC00002-4

Comment: Another concern of Westchester and Playa del Rey residents is the proposed construction parking and staging area on Westchester Parkway. Such a staging area originally was proposed in the Draft EIR for the modernization of the Tom Bradley International Terminal, although we have been promised that it will be removed from that project. Having it included in the proposal here suggests that it has taken on a life of its own. Similarly, there is a second staging area for large equipment planned for the area between the Ralphs/CVS shopping center on Sepulveda and the fire station at Emerson, just off Westchester Parkway. As this is close to residences, our concern is that the equipment would exacerbate both air pollution and noise unbearably for those residences during the construction process. Please ensure that all construction staging and parking occurs on Pershing, further away from residential areas.

Response: Please see Response to Comment CUP-PC00001-2 regarding the use of construction staging locations for the CUP-RP and other LAX-related construction projects. As discussed in that response, no CUP-RP construction parking or staging would occur in the north area bordering Westchester. All CUP-RP construction staging and parking would be located within the CTA.

CUP-PC00002-5

Comment: In addition to the antiquated and polluting equipment used in the current utility plant, one of its worst features is that there is no backup in the event the plant fails as a result of any natural or man-made disaster. The CUP-RP must provide for sufficient redundancies to allow continued power in such event. We do not see this discussed in the Draft EIR.

Response: As described in Section 2.4, pages 2-11 through 2-23, of the CUP-RP Draft EIR, the purpose of the proposed CUP-RP is to replace the existing CUP, which provides space heating and cooling for terminals within the Central Terminal Area (CTA). As with the existing CUP, the proposed CUP-RP would not generate energy that serves the power needs of the CTA (see Draft EIR Sections 1.1 and 2.4.3 for further details). Although no electricity is being delivered from the CUP cogeneration units to other non-CUP facilities within the airport under normal conditions, during winter, when the electrical demand of the existing CUP drops and the cogeneration units are running, electricity may be exported from the CUP to the LADWP grid. Components of the proposed new CUP include the replacement of the existing, obsolete CUP and maintenance shop, a new cooling tower system, site electrical upgrades to support operation of the new CUP, construction of a thermal energy storage (TES) tank, replacement of a portion of the chilled water and hot water lines, a potential water treatment facility for reclaimed/recycled water, and potential biogas use.

The CEQA Guidelines states that "An EIR shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to *changes in the existing physical conditions in the affected area* as they exist at the time the notice of preparation is published…"(CEQA Guidelines Section 15126.2, italics added). However, the proposed project includes backup systems to allow continuous heating and cooling service during temporary repairs or power outages. The cooling system has been designed with a redundant chiller to allow temporary repair of any unit. All pumps for the chilled and hot water systems have been designed with a spare pump. In the event of a loss of power at the replacement CUP, a 250kW diesel generator would

provide backup power to all emergency lighting and power circuits, including the Control room servers, fire alarm, UPS systems, FMCS, and communications systems.

CUP-PC00002-6

Comment: We also are concerned that the maps and diagrams in the Draft EIR show utilidors to carry electricity, water and sewer lines, but do not show them connecting with all the terminals. We assume that such connections will take place, but the lack of discussion in this document suggests that the environmental impacts of their construction are not being considered.

Response: As noted above under Response to Comment CUP-PC00001-4, the purpose of the proposed CUP-RP is to replace the existing CUP, which provides hot and chilled water used for heating and cooling of terminals and other buildings within the CTA. The replacement CUP would not provide any electrical, water, or other utility service to the CTA; however, the construction of the Utilidor or Direct Burial Alternative provides the opportunity to replace other aging utility lines, such as water lines, electrical ducts, and communications ducts. The connection of new pipelines to the chilled and hot water systems within existing buildings would include replacement of existing older related equipment such as pumps, piping, energy transfer stations, heat exchangers, instrumentation and controls, valves, and electrical equipment. The project description has been revised to reflect this; please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR. The utilidor is shown in Figure 2-7 on page 2-21 in Section 2.4.5 of the CUP-RP Draft EIR, and the direct burial utility line alternative, in the alignment shown in Figure 6-1 in Section 6.4.3.2, page 6-7, of the CUP-RP Draft EIR. Either of these alignments would serve all terminals and facilities currently served by the existing CUP. These include Terminals 1, 2, 3, 4, 5, 6, 7, and 8, Tom Bradley International Terminal, the Theme Building and Administration East. Figure 2-7 in the Draft EIR does not show a utilidor connection to Terminal 6 because hot water and chilled water for that terminal are supplied through pipes that extend internally from Terminal 7 (i.e., the utilidor connection to Terminal 7 would provide hot water and chilled water for both Terminals 6 and 7). The general alignments and road crossings shown in Figures 2-7 and 6-1, respectively, and estimated grading based on the depth and length of pipeline excavations, as discussed in the Draft EIR, Section 2.4.5, page 2-19, and Section 6.4.3.2, page 6-6, are all factors in the evaluation of the CUP-RP's impacts (including construction ground transportation and construction emissions impacts). Notwithstanding that the CUP-RP Final EIR has taken into consideration the additional grading associated with accommodation of other utility lines, such as water lines, electrical ducts, and communication ducts (see above), it should be noted that, as is standard practice for all large-scale construction projects, excavation volumes are conservative so that minor changes in alignments due to subsurface conditions that are not known at the preliminary planning stage would not affect the evaluation of the project's environmental impacts. Therefore, environmental impacts resulting from construction of the CUP-RP would not change due to minor changes or adjustments in the pipeline alignments described in this Final EIR.

CUP-PC00002-7

Comment: Our Committee members believe that the Draft EIR must address these issues. Thank you for your consideration of our comments. To contact the Committee Chair, please call the group's facilitator at (310) 646-5742 x7109 in the Community Relations Office. See attached mission statement.

Response: The comment is noted. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00002-8

Comment: Mission Statement

The Los Angeles International Airport Area Advisory Committee (LAXAAC) has been in existence for more than 30 years as an advisory board to the Board of Airport Commissioners (BOAC).

Members of the committee are appointed by the appropriate legal authority in communities immediately surrounding LAX:

El Segundo,
Lennox,
Hawthorne,
Inglewood,
Culver City,
Marina del Rey,
and the Westchester and Playa del Rey areas of Los Angeles.

The members of LAXAAC have one overriding concern about LAX: safety. This concern includes safety for those who work or live near LAX in addition to air passengers, crews, and aircraft.

Other concerns for committee members are air and noise pollution and surface traffic in and around their communities.

The members of LAXAAC will continue to participate in LAX issue discussions and proposals and look forward to on-going interaction with the members of the BOAC and LAWA staff.

Response: The mission statement of the Los Angeles International Airport Area Advisory Committee is noted. The mission statement is neither specific to the CUP-RP nor does it raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003 Bischoff, David None Provided 9/14/2009

CUP-PC00003-1

Comment: The fact that the Central Utility Plant (CUP) at LAX is finally being brought up to current day standards and capabilities is absolutely wonderful. Truthfully, no modernization of the Airport can be legitimately accomplished without also addressing the CUP. However, there also are four other areas of consideration that need to be remembered, addressed, and evaluated as the "whole" plan becomes real. The four are:

1) Life Expectancy. The current CUP has lasted and has been functioning for over fifty (50) years. Yes, there have been some upgrades and modifications, but that building has been there maintaining its responsibility for 50 years. Is it wrong to assume that the new CUP, when built, will also be around for the next 50 years? That's around 2060 when the Citizens of Los Angeles will be entertaining these discussions again. Wouldn't it be wise to anticipate that between 2010 and 2060, that new inventions, systems, and needs will

occur and come to light during that time frame? Wouldn't it then be wiser to make sure, to the best of our ability, that the new CUP be prepared and be capable of accepting and handling those new ideas and systems with as little difficultly as possible "DURING THE NEXT 50 YEARS".

Response: This comment is noted. The replacement CUP, if approved, would be state of the art, and is a prudent investment, even in light of technological advances in the future. The life expectancy of the replacement CUP is estimated to be 50 to 75 years with proper maintenance. Some of the equipment and systems within the new CUP would be replaced during the building's lifetime with newer systems that may reflect technological advancements. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR.

CUP-PC00003-2

Comment: 2) Maintenance Costs. Speaking of 50 years, when we have something built, shouldn't we also ask ourselves, the builders, and the designers "how much money ($) is this going to cost us to maintain over it's life time as the result of building this thing as it's currently conceived"? Are there areas of design that need to be addressed to lower those long-term costs of the building? How about safety? Will the workers maintaining this thing ever be in un-due jeopardy?

Response: The comment is noted. Operation of the replacement CUP, as with the existing CUP, would comply with LAWA and CALOSHA safety standards and would not place workers in undue jeopardy as a result of the on-going operation of the replacement CUP. Please also see Section 5.5 and Appendix A (Initial Study) of the CUP-RP Draft EIR for discussion of hazardous materials. Cancer-risks related to construction of the CUP-RP would be significant for adult workers within the CTA. All feasible mitigation measures would be implemented, but the risk would remain significant and unavoidable. See Section 4.3 of the CUP-RP Draft EIR for further details.

An environmental impact report is only required to analyze the physical environmental impacts of a project (Pub. Res. Code, §§21100, 21060.5). Economic effects of a project are not environmental effects unless the economic effect causes some physical change, such as urban blight (CEQA Guidelines, § 15131). There is no evidence that the CUP-RP would result in an economic effect leading to a physical change. Therefore, the financial costs associated with maintenance of the replacement CUP over its lifetime are not analyzed in the Draft EIR. Nonetheless, it should be noted that substantial consideration was given to issues of cost and maintenance by LAWA management in designing the proposed project and this information will be available to the project's decision-makers. The CUP-RP has been designed to reduce maintenance and long-term operating costs, which would be the case with the proposed Utilidor or the Direct Burial Alternative. Both approaches to the water service lines would be consistent with the objective of the CUP-RP to reduce costs (see Section 2.3 of the Draft EIR). While the Utilidor would incur less long-range maintenance cost due to the ease of accessing utility lines within a concrete tunnel, compared to the Direct-Burial Alternative, the Utilidor would have substantially higher overall costs and greater construction impacts due to more extensive excavation (see Section 6.4.3.2 of the Draft EIR). Although long-term maintenance costs would be greater with the Direct Burial Alternative, it would still substantially reduce current maintenance costs and would also minimize long-term maintenance costs through the following design technologies: (1) factory insulated pipe (a recent technology that is superior to that previously available); (2) lines running to

vaults that would be installed at strategic locations to give greater access; (3) installation of additional duct bank and piping that would go into service at a later time to avoid future disruptions of the CTA. With the installation of these features, the maintenance costs associated with the Direct Burial Alternative would be considerably reduced compared to a more standard installation and overall, the Direct Burial Alternative would be far less costly than the Utilidor Alternative. Chapter 6, Alternatives, of the CUP-RP EIR has been revised to reflect this. Please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR.

CUP-PC00003-3

Comment: 3) Project Costs. How much is this going to cost me? I can't believe it! Is there any aspect of this project that can be accomplished in a less expensive way? There are other things I want to do with my money, so if there are any corners we can cut.....let's do it. As long as the thing works when we're finished, is all that's important. To scrimp here and there in the effort to be able to do more does not mean the project was handled correctly. Frequently, projects have to down shift to second gear so as to guarantee that in the end all was done right and correct.

Response: The comment is noted. Please see Response to Comment CUP-PC00003-2. An environmental impact report is only required to analyze the physical environmental impacts of a project (Pub. Res. Code, §§21100, 21060.5; CEQA Guidelines § 15131). Therefore, the financial costs associated with the CUP-RP are not analyzed in the Draft EIR. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003-4

Comment: 4) Architects, Engineers, and Executive Management. Although they all have different responsibilities and activities for their careers, all three have one common/similar question in regards to a project, their financial reimbursement not with standing: How will this benefit me? Will this endeavor project me to a higher level in my next position? All three occupations, when government projects are involved, occur as the result of politicians trying to impress their electorate and therefore prove that they deserve to stay in office or even better, to move on up to a higher position. The same concept goes for these three positions: the more flash and flamboyance of their last project increases their opportunities for the next.

Response: The comment is noted. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003-5

Comment: It has been estimated that the cost of properly installing the complete piping network for the new CUP with utilidors is $250,000,000. Yes, I agree that's a lot of money; however the return on investment (ROI) over a 50 year time frame could be incredible. Also, if the current desired plan of the direct burial approach is used the initial cost savings could be nominal and prevent LAX many opportunities, again OVER THE NEXT 50 YEARS.

Response: The comment is noted and will be forwarded to the decision-makers for consideration during project deliberations. Please see Response to Comment CUP-PC00003-2. An environmental impact report is only required to analyze the physical environmental impacts of a project (Pub. Res. Code, §§21100, 21060.5; CEQA Guidelines Section15131).

CUP-PC00003-6

Comment: The most apparent disadvantage with utilidors is the fact that they are NOT flashy, no one knows they're there. Politicians, Architects, Engineers, and Executive Management can not flaunt a project that they have been involved with unless it is really apparent and noticeable. Most folks have a short memory span and they have to be reminded again and again with eye catching images. The utilidors for LAX would house the High Temp water supply and return (used for area heating and the creation of domestic hot water), the Chill Water supply and return (used for air conditioning), and a back-up supply and return matrix (that when put on-line, would allow for repairs and/or up-dates/modifications to either of the other two systems). [sic] Also the utilidors can be used for other Central Terminal Area (CTA) infrastructure systems. There is only one word that describes utilidors.....BORING.

Response: The comment is noted. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003-7

Comment: Currently there are needs for a complete re-do of the Information Technology (IT) fiber optics system. The present fiber optics system is over-used and under-sized. The idea now in play is to install conduit along the CTA's upper roadway. Although this design would work it's NOT state-of-the-art and exposes the system to many possible hazards and interruptions. The utilidors WOULD give a state-of-the-art infrastructure solution to this critically important communication/business application system. The utilidor system always being available to expand and/or for modification assessability. The utilidors can also offer pathways for power line infrastructure, other telecommunication transmission lines and for other needs and inventions that will be coming along IN THE NEXT 50 YEARS.

Response: The comment is noted and will be forwarded to the decision-makers for consideration during project deliberations. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003-8

Comment: The final offering that utilidors would provide and one that is never hoped for is to provide access and/or evacuation in the event of an emergency. In as much as each utilidor enters every CTA Terminal in the first floor Pump Room location, people in danger could evacuate and/or Police/Security forces could enter the Terminals if need be without being observed.

Response: The comment is noted. Your support for the proposed Utilidor will be forwarded to the decision-makers for consideration during project deliberations. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003-9

Comment: LAWA needs to do what is right and correct and not succumb to pressures that are personal. Fortunately, the Mid-Field Terminal project is on hold. That is alright. With the completion of the Bradley West Gate Project, LAX will be able to accommodate the new and next generation of aircraft and more than enough traveling public for the foreseeable future. But what we don't need to spend our money on are acres and acres of beautiful flashy ocean waves on top of the areas that are now Parking Structures 2B, 3, 4 and 5, or on the North and South Concourses of the Bradley. These waves are going to cost a fortune to maintain and what type of safety hazards will our maintenance personnel face in keeping this man-made ocean allusion attractive?

Response: The comment is noted. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003-10

Comment: Should the LAX Construction and Maintenance Division have to dig up parking lots, area planters or structures of any kind because there happens to be a leak in the High Temp water line because they were buried in the ground?

Response: The comment is noted. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PC00003-11

Comment: LAX should not forget the basics and the basics done correctly. Utilidors for our infrastructure, our North Runways moved to proper configuration and distances to accommodate the new gigantic, less polluting, less noise creating aircraft that will be flying IN AND OUT FOR THE NEXT 50 YEARS.

The responsibility that lies with us all now, is to guarantee that LAX will stay and be the Gateway of the Pacific FOR THE NEXT 50 YEARS.

Response: The comment is noted. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and, thus, does not require further response. However, the comments and responses on the CUP-RP Draft EIR will be considered by the decision-makers during project deliberations.

CUP-PC00004 Cope, Danna None Provided 9/14/2009

CUP-PC00004-1

Comment: The proposed Central Utility Plant replacement project (CUP-RP) must be completed to replace aged and the potentially dangerous electrical system and heating and cooling

facilities at LAX. However, the plan presented to the community needs some modifications and clarifications, especially during the construction phases.

Response: The comment is noted. Please see Responses to Comments CUP-PC00004-2 through CUP-PC00004-7 below.

CUP-PC00004-2

Comment: Mitigation measures must be included to correct the environmental impacts from the CUP construction. The Draft EIR proposals to require construction measures to mitigate air pollution, noise, dust, hours of operation, construction workers' parking and transportation, and disturbance for neighboring communities are inadequate, as the Draft EIR explicitly recognizes that these measures will impact the surrounding communities. The mitigation measures stated in the Draft EIR are merely generalities without necessary methods and procedures to ensure compliance.

Response: The content of this comment is essentially the same as comment CUP-PC00002-2. Furthermore, no specifics are provided in the comment regarding why proposed mitigation measures are considered too general and unclear. The mitigation measures proposed in Sections 4.2.5 and 4.3.5 of the CUP-RP Draft EIR, are specific enough to achieve their intended results. Please refer to Response to Comment CUP-PC00002-2.

CUP-PC00004-3

Comment: Of particular concern is the significant air pollution that would be created for nearby communities which would not be adequately mitigated by the Draft EIR's proposed measures.

As one of the authors, I agree with the points made by the LAX Area Advisory Committee:

"The levels of PM_{10} are indicated as “significant” during the construction process (see page 4-84) and the significant levels of these pollutants as well as others (volatile organic compounds and nitrogen oxides) are “unavoidable” during construction (page 1-9). Given these findings, we believe that additional mitigation measures must be incorporated during construction, so that the project-related cancer risks are diminished. Otherwise, you are simply trading increased cancer levels in the surrounding communities for energy efficiency at the airport. Despite our belief in the goal of energy efficiency, we are not willing to accept that trade.

Response: The content of this comment is essentially the same as part of comment CUP-PC00002-3; please refer to Response to Comment CUP-PC00002-3.

CUP-PC00004-4

Comment: "The Draft EIR also does not adequately account for all of the potential health effects of such pollution, e.g., the high incidence of asthma in communities adjacent to the airport. Current air pollution studies have shown that particles larger than PM_{10} can cause serious lung damage and that particulate matter smaller than the $PM_{2.5}$ level can settle in the bronchial tubes and lungs and cause health problems. We also are concerned that the project’s effects on air pollution are not examined thoroughly enough, particularly

because the Draft EIR did not address particulate matter smaller than the $PM_{2.5}$ level. Inasmuch as technology is now available to look at this smaller particulate matter, we believe LAX should do so."

Response: The content of this comment is essentially the same as part of comment CUP-PC00002-3; please refer to Response to Comment CUP-PC00002-3.

CUP-PC00004-5

Comment: "Another concern of Westchester and Playa del Rey residents is the proposed construction parking and staging area on Westchester Parkway. Such a staging area originally was proposed in the Draft EIR for the modernization of the Tom Bradley International Terminal, although we have been promised that it will be removed from that project. Having it included in the proposal here suggests that it has taken on a life of its own. Similarly, there is a second staging area for large equipment planned for the area between the Ralphs/CVS shopping center on Sepulveda and the fire station at Emerson, just off Westchester Parkway. As this is close to residences, our concern is that the equipment would exacerbate both air pollution and noise unbearably for those residences during the construction process. Please ensure that all construction staging and parking occurs on Pershing, further away from residential areas."

Response: The content of this comment is similar to comments CUP-PC00001-2 and CUP-PC00002-4. Please refer to Responses to Comments CUP-PC00001-2 and CUP-PC00002-4.

CUP-PC00004-6

Comment: "In addition to the antiquated and polluting equipment used in the current utility plant, one of its worst features is that there is no backup in the event the plant fails as a result of any natural or man-made disaster. The CUP-RPI must provide for sufficient redundancies to allow continued power in such event. We do not see this discussed in the Draft EIR."

Response: The content of this comment is essentially the same as comment CUP-PC00002-5. Please refer to Response to Comment CUP-PC00002-5.

CUP-PC00004-7

Comment: "We also are concerned that the maps and diagrams in the Draft EIR show utilidors to carry electricity, water and sewer lines, but do not show them connecting with all the terminals. We assume that such connections will take place, but the lack of discussion in this document suggests that the environmental impacts of their construction are not being considered."

Thank you for your consideration of my comments.

Response: The content of this comment is the same as comment CUP-PC00002-6; please refer to Response to Comment CUP-PC00002-6.

CUP-PC00005 Cain, Gavin Jenkins/Gales and Martinez, Inc. 8/24/2009

CUP-PC00005-1

Comment: Lisa, I attended the presentation last week at Flightpath and am under the impression the minutes, photographs/photoboards/diagrams, and Powerpoint presentation will be made available. Are they available for download via BAVN, or is there another way to obtain the documents, etc?

Response: As requested, a response was provided via email on August 24, 2009, referring the commenter to the referenced presentation boards/diagrams/files available under the "Projects-Publications" button at www.ourlax.org. Files posted on the website are available for download.

CUP-PH00001 Bischoff, David None Provided 8/18/2009

CUP-PH00001-1

Comment: Yeah, I won't be talking for 33 minutes. I could, but I won't. No. Anyway, good evening folks. My name is David. I work here at the airport, and I have since 1990. When I transferred over from Hyperion I was an apprentice pipe fitter, and my first two and a half years was spent at the CUP. I put in the brand new chill water unit with Stanley Mukagawa who was the senior pipe fitter at the time. I left the CUP and went to the plumbing shop in the construction maintenance for the next 15 some odd years where I was involved with a variety of things, frequently with the CUP. I worked swing shifts so I spent a lot of time in the CUP on the off-shifts.

Response: This comment is noted. The comment does not raise an issue regarding the contents or adequacy of the CUP-RP Draft EIR and thus, does not require further response.

CUP-PH00001-2

Comment: First of all on the drawing over there on the Utilidor it doesn't mention terminal six. It doesn't go to terminal six it kind of like forgets it, I guess.

Response: Please see Response to Comment CUP-PC00002-6 regarding utility line service to the CTA. As discussed therein, the new hot water and cold water utility lines would serve all terminals and facilities currently served by the existing CUP. These include Terminals 1, 2, 3, 4, 5, 6, 7, and 8, Tom Bradley International Terminal, the Theme Building and Administration East. Figure 2-7 in the Draft EIR does not show a utilidor connection to Terminal 6 because hot water and chilled water for that terminal are supplied through pipes that extend internally from Terminal 7 (i.e., the utilidor connection to Terminal 7 would provide hot water and chilled water for both Terminals 6 and 7).

CUP-PH00001-3

Comment: Anyway, there's one thing about construction projects that seems to be forgotten, and that is maintenance of the projects after everybody leaves. After all the designers and everything make this beautiful thing with all the latest state-of-the-art, maintenance is

forgotten. Yet, the bulk of the costs over the long term is maintenance costs. Now, in the 50s when they were building the old tower, the theme building and the CUP, they were, guess what? running out of money on the theme building because it was going to be so beautiful. So they took a lot of the dollars from the CUP project and they decided, you know what we're going to do? We were going to have Utilidors for the pipes. Instead let's just bury them in the ground and it'll be there where you won't have to worry about it ever again. Not. Not. Over time steel pipes break. Steel pipes leaks. There was a variety of problems. I don't know how many nights I spent in the CTA all night leaving at seven o'clock in the morning repairing another leak. Okay. I am in favor of the Utilidors for a variety of reasons. First of all, maintenance costs are easier and over time so let's figure this project will be worth another fifty years of our life here and we all will probably have vanished from the planet by then. Over the next fifty years people can maintain the pipes, upgrade the systems and all the new technical widgets and exotic stuff that people will develop, and we're only on the brink of that, and the costs will be comparatively a lot less. So we need the Utilidors. The... and I also feel that not only should there by the high temps supply and return, the low temp or the chill water supply and return but also a spare supply and return so you have three piping systems in the Utilidors from the CUP to the terminals in however the configuration finally goes because that will give you the capabilities for the next five decades in which this project will be in use. Thank you.

Response: The comment is noted. An environmental impact report is only required to analyze the physical environmental impacts of a project (Pub. Res. Code, §§21100, 21060.5; CEQA Guidelines § 15131). The financial costs associated with the Direct Burial Alternative would not result in urban blight or other physical changes in the environment, and are therefore not analyzed in the CUP-RP Draft EIR. The physical environmental impacts associated with this alternative are analyzed in Section 6.4.3.2 of the Draft EIR. Your support for the construction of the proposed Utilidor over the Direct Burial Alternative is noted and will be forwarded to the decision-makers for consideration during project deliberations. Nonetheless, it should be noted that substantial consideration was given by LAWA management to issues of cost and maintenance in designing the proposed project and this information will be available to the project's decision-makers. The CUP-RP has been designed to reduce maintenance and long-term operating costs, which would be the case with the proposed Utilidor or the Direct Burial Alternative. Both approaches to the water service lines would be consistent with the objective of the CUP-RP to reduce costs (see Section 2.3 of the Draft EIR). While the Utilidor would incur less long-range maintenance cost due to the ease of accessing utility lines within a concrete tunnel, compared to the Direct-Burial Alternative, the Utilidor would have substantially higher overall costs and greater construction impacts due to more extensive excavation (see Section 6.4.3.2 of the Draft EIR). Although long-term maintenance costs would be greater with the Direct Burial Alternative, it would still substantially reduce current maintenance costs and would also minimize long-term maintenance costs through the following design technologies: (1) factory insulated pipe (a recent technology that is superior to that previously available); (2) lines running to vaults that would be installed at strategic locations to give greater access; (3) installation of additional duct bank and piping that would go into service at a later time to avoid future disruptions of the CTA. With the installation of these features, the maintenance costs associated with the Direct Burial Alternative would be considerably reduced compared to a more standard installation and overall, the Direct Burial Alternative would be far less costly than the Utilidor Alternative. Chapter 6, Alternatives, of the CUP-RP EIR has been revised to reflect this. Please see Chapter 3, Corrections and Additions to the CUP-RP Draft EIR.

The commenter also suggests that the project should include "a spare supply and return so you have three piping systems in the Utilidors from the CUP to the terminals." A spare

piping system within the Utilidor is not considered appropriate at this time, since there is not likely to be a need for a pipeline replacement within an approximately 30-year period. At that point in time, a "spare" pipeline would have been exposed to the same aging agents as the working pipelines and therefore, it would not be practical or cost efficient. Also, a function of the Utilidor and the Direct Burial Alternative (with vaults) is accessibility for future pipeline replacement. As both the Utilidor and the Direct Burial Alternative would provide such accommodation, the installation of a third piping system is not considered necessary at this time. In addition, a spare piping system would increase construction costs and the overall scale of construction activities and, therefore, would increase to some extent the project's significant impacts associated with construction activity.

CUP-PH00002 Schneider, Nan ARSAC 8/18/2009

CUP-PH00002-1

Comment: Hi, I'm Nan Schneider of ARSAC and I want to thank you first of all for doing the CUP project, it's been long overdue. Failures at the airport, you know, you can't have a modern airport without modern utilities. So we are grateful for that.

Response: The comment is noted. Your general support for the CUP-RP will be forwarded to the decision-makers for consideration during project deliberations. The comment does not raise an issue regarding the contents or adequacy of the Draft EIR and, thus, does not require further response. However, it is noted that the replacement CUP, if approved, would be state of the art, and is a prudent investment.

CUP-PH00002-2

Comment: I'm highly disappointed to see that we have put staging areas again on the border of Westchester. I don't understand why you don't use the same staging areas that you're going to be using for the Bradley.

Response: Please see Response to Comment CUP-PC00001-2 regarding construction parking and staging in the north area of the airport. As discussed in that response, no CUP-RP construction parking or staging would be provided in the north area bordering Westchester. All CUP-RP construction parking and staging would be located within the Central Terminal Area (CTA).

CUP-PH00002-3

Comment: I…, but again I think this is a wonderful project. The only thing I would suggest is that you put the rest of the Utilidors for the terminals that are not added to this because it's just going to cost more later. That's it.

Response: Please see Response to Comment CUP-PC00002-6 regarding the extension of the project's new hot water and cold water lines to all terminals. As discussed in Response to Comment CUP-PC00002-6, the proposed utility line system would serve all terminals and facilities currently served by the existing CUP. These include Terminals 1, 2, 3, 4, 5, 6, 7, and 8, TBIT, Theme building and Administration East. Figure 2-7 in the Draft EIR does not show a utilidor connection to Terminal 6 because hot water and chilled water for

that terminal are supplied through pipes that extend internally from Terminal 7 (i.e., the utilidor connection to Terminal 7 would provide hot water and chilled water for both Terminals 6 and 7).

CUP-PH00003 MacLellan, Nora Westchester/Playa Del Rey Neighborhood Council 8/18/2009

CUP-PH00003-1

Comment: My name is Nora MacLellan. I'm a resident of Playa del Rey. I'm a, I'm a board member of the neighborhood council of Westchester/Playa, past secretary of ARSAC. I think that the, the central utility plant— brilliant- needs to be done. I love the suggestions of the previous gentleman to have some backup systems in place is excellent and I look forward to this project commencing. It's long overdue.

Response: The comment is noted. Your support for the CUP-RP will be forwarded to the decision-makers for consideration during project deliberations. Please see Responses to Comments CUP-PH00001-1 through CUP-PH00001-3 for responses to David Bischoff's ("previous gentleman") comments.

CUP-PH00003-2

Comment: However, after reviewing these boards, I notice there've been additions to the boards since the TBIT. An agreed to employee parking in staging areas on Westchester parkway are still there. There's…, the agreed to… and those parking areas were to be removed. The agreed to new parking area staging area on Pershing is in place, which is fabulous, and then there's a brand new construction staging area just east of the fire station off of Westchester Parkway in Westchester right behind Sepulveda. This is not going to work. You have, these are residential communities, we cannot handle the traffic, we cannot handle the noise, we cannot handle the additional pollution and this is not what we are going to stand for, nor have we agreed to. Thank you.

Response: Please see Response to Comment CUP-PC00001-2 regarding the use of construction staging locations for the CUP-RP and other LAX-related construction projects. As discussed in that response, no CUP-RP construction parking or staging would occur in the north area bordering Westchester. All CUP-RP construction staging and parking would be located within the Central Terminal Area (CTA). It should be noted that the board referred to by the commenter, which is a copy of Figure 4.1-6 of the CUP-RP Draft EIR, identifies the same construction staging areas for cumulative projects as did the analogous figure (Figure 4.3-6) of the Bradley West Project Final EIR, as amended in Chapter 3. No new construction staging areas have been added to this figure.

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3. CORRECTIONS AND ADDITIONS TO THE CENTRAL UTILITY PLANT REPLACEMENT PROJECT DRAFT EIR

3.1 Introduction

As a result of clarifications to, and comments received on, the Draft Environmental Impact Report (Draft EIR) for the Central Utility Plant Replacement Project (CUP-RP), as well as minor refinements to the proposed project, the following revisions are hereby made to the text of the CUP-RP Draft EIR. Changes in text are signified by strikeouts where text is removed and by italics where text is added, unless otherwise noted. These changes do not add significant new information to the EIR, nor do they disclose or suggest new or substantially more severe significant environmental impacts of the CUP-RP.

The minor refinements to the proposed project include co-locating other linear utilities, such as water lines and communication and power ducts, with the placement of the new hot water and chilled water lines that occur~~s~~ as part of the CUP-RP. The additional water lines include a potable water line, a reclaimed water line, and a fire water line, which would fit within the Utilidor proposed as part of the project. The additional communication and power ducts that have been added to the project since publication of the Draft EIR would be placed adjacent to the power duct that was already included in the project, and would fit within the trench area assumed in the Draft EIR impacts analysis. These project refinements would require some new trenching, including approximately 500 linear feet of small trench for a power duct (only) east of Parking Structure P-3 within the Central Terminal Area (CTA) and approximately 325 linear feet of trench extending west of the CUP on Center Way, as further described in the Corrections and Additions discussion below. Regarding the latter trench segment, this would provide for dual Utilidor segments extending west of the CUP; one on Center Way North and the other on Center Way (south) up to where they would merge back into the single Utilidor on Center Way west of west way. Each of the parallel segments of Utilidor would require only about half to three-quarter the trench size of the originally proposed single Utilidor segment assumed in the Draft EIR analysis. The net increase in grading associated with the additional Utilidor segments extending west from the replacement CUP is estimated to be approximately five to ten percent of the original grading, and the additional grading activity would be spread out over an extended construction period for the Utilidor (i.e., approximately 16.5 months as compared to the original schedule of 15 months). No increase in peak daily construction activity, as assumed in the Draft EIR, is anticipated to occur. The additional trench segments would occur within developed portions of the CTA at, or in proximity to, the other project-related impact areas addressed in the Draft EIR. These project refinements would not result in any notable changes to the impacts analyses of the proposed project, as addressed in the Draft EIR, and no changes in the significance conclusions presented therein.

Similar to the aforementioned refinements to the proposed project, the co-location of additional linear utilities with the new hot water and chilled water lines would also occur for the Direct Burial Alternative addressed in Chapter 6 of the Draft EIR. Under that scenario, the trench size for the pipelines route assumed in the Draft EIR would need to be increased and additional new segments similar to those described above for the proposed project would also occur. The additional trenching required would increase the amount of required grading by approximately 90 percent. The 15-month construction period assumed for the pipelines portion of the Direct Burial Alternative would be extended by approximately 6 months. These refinements would change the daily vehicle trip generation characteristics of the subject alternative, as well as its air quality-related impacts, from those described in the Draft EIR, but would not change the basic conclusions of the Draft EIR relative to the ability of the alternative to avoid or substantially reduce significant impacts associated with the proposed project. The changes in traffic generation and air quality-related impacts are identified in the Corrections and Additions discussion below.

3.2 Corrections and Additions to the Draft EIR

Chapter 1, Introduction

1. The third and fourth paragraphs on pages 1-3 and 1-4 of the Draft EIR, under subheading Chapter 6-Alternatives of Section 1.4 Organization of this EIR have been revised as follows:

> The Direct Burial Alternative would change the construction technique used in the development of the underground ~~chilled water and hot water~~ pipelines *and ducts* extending west from the CUP. Under the Direct Burial Alternative, the Utilidor proposed to extend west from the CUP would not be developed and ~~chilled water and hot water~~ *utility* lines would be placed directly in trenches. Since concrete would not be inserted or poured into the trench, the Direct Burial Alternative would require a smaller clear space. Excavated materials associated with the pipelines extending west from the CUP, and associated construction activities, would be considerably reduced (~~23,500~~ *44,650* cubic yards (cy) for the Direct Burial Alternative versus ~~143,500~~ *157,850* cy for the proposed Utilidor). The Direct Burial Alternative would also have greater flexibility in passing through existing underground facilities and pipelines. The Direct Burial Alternative would avoid the significant VOC emissions and PM10 concentration impact associated with construction of the proposed project. ~~It would also avoid the significant construction related impact on global climate change.~~
>
> As discussed in section 6.4.3.3, the environmentally superior alternative is the No Project Alternative because it would eliminate the significant impacts associated with construction, including air pollutant emissions, *and* human health risk~~, and global climate change~~. The environmentally superior build alternative is the Direct Burial Alternative because it would avoid the significant air quality and ~~global climate change~~ *human health risk* impacts of the proposed project as stated above.

The corrections provided above that relate to the significance of construction-related global climate change impacts for the Direct Burial Alternative are due to a typographical error in the Draft EIR, as further described below under Chapter 6, Alternatives, Correction 17.

2. The third page of Table 1-1 on page 1-8 of the Draft EIR is hereby revised to include the following at the end of the column "LAX Master Plan Mitigation Measures and Commitments":

> ***MM-ST-1: Require CTA Construction Vehicles to Use Designated Lanes****. Whenever feasible, construction vehicles shall be restricted to designated roadways or lanes of traffic on CTA roadways adjacent to the existing close-in parking, thus limiting the mix of construction vehicles and airport traffic.*
>
> ***MM-ST-2: Modify CTA Signage****. During construction, additional signage will be installed, as required, to separate construction traffic from non-construction traffic to the extent feasible.*

3. The fourth, fifth, and sixth pages of Table 1-1 on pages 1-9 through 1-11 are hereby revised as follows:

> **MM-AQ-2. Construction-Related Measure**. This mitigation measure describes numerous specific actions to reduce fugitive dust emissions and exhaust emissions from on-road and off-road mobile and stationary sources. Mitigation strategies include the following:
>
> - *Apply non-toxic soil stabilizer to all inactive construction areas (i.e., areas with disturbed soil).*

- *Following the addition of materials to, or removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing non-toxic soil stabilizer.*
- Post a publicly visible sign with the telephone number and person to contact regarding dust complaints; this person shall respond and take corrective action within 24 hours.
- Prior to final occupancy, the applicant demonstrates that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.
- All roadways, driveways, sidewalks, etc. being installed as part of the project should be completed as soon as possible; in addition, building pads should be laid as soon as possible after grading.
- Pave all construction access roads at least 100 feet on to the site from the main road.
- To the extent feasible, have construction employees' work/commute during off-peak hours.
- Make available on-site lunch trucks during construction to minimize off-site worker vehicle trips.
- *Utilize on-site rock crushing facility, when feasible, during construction to reuse rock/concrete and minimize off-site truck haul trips.*
- Prohibit staging ~~and~~ *or* parking of construction vehicles (including workers' vehicles) on streets adjacent to sensitive receptors such as schools, daycare centers, and hospitals.
- Prohibit construction vehicle *and engine* idling in excess of ~~ten~~ *five* minutes *and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449*.
- Specify ~~combination of~~ *conditions for* electricity from power poles ~~and portable diesel- or gasoline-fueled generators using "clean burning diesel" fuel and exhaust emission controls~~ *for electrification of service equipment and auxiliary power units at the facility. Auxiliary power units, such as portable diesel or gasoline fueled generators, shall use "clean burning diesel" (i.e., low sulfur) and exhaust emission controls as feasible and appropriate*.
- Suspend use of all construction equipment during a second-stage smog alert in the immediate vicinity of LAX.
- *Specify combination of construction equipment using "cleaner burning diesel" fuel and exhaust emission controls.*
- Utilize construction equipment having the minimum practical engine size (i.e., lowest appropriate horsepower rating for intended job).
- Require that all construction equipment working on-site is properly maintained (including engine tuning) at all times in accordance with manufacturers' specifications and schedules.
- Prohibit tampering with construction equipment to increase horsepower or to defeat emission control devices.
- The contractor or builder shall designate a person or persons to ensure the implementation of all components of the construction-related measure through direct inspections, record reviews, and investigations of complaints.

Chapter 2, Project Description

1. The first paragraph under Section 2.2.2 Potential Off-Site Recycled/Reclaimed Water Facilities on page 2-2 of the Draft EIR is hereby revised as follows:

> Another component of the CUP-RP is the potential use of recycled/reclaimed water for cooling tower make-up water to reduce the demands for potable water. LAWA and DWP *share a mutual interest and desire to use recycled/reclaimed water at the CUP. They are jointly* ~~are currently~~ evaluating potential design options for, and feasibility of, installation of a recycled/reclaimed water pipeline that connects to the new (replacement) CUP and construction of an off-site treatment system to condition the water prior to use in the cooling tower system (i.e., ~~prevent~~ *reduce* the corrosiveness of the water and *address* ~~prevent~~ the potential for water odors). Two potential treatment system sites currently being considered are located in proximity to an existing 24-inch LADWP recycled/reclaimed water pipeline, which originates at LADWP's West Basin Municipal Water Recycling Center in the City of El Segundo. **Figure 2-4**, shows the location of the existing 24-inch recycled/reclaimed pipeline, the two potential recycled/reclaimed water treatment system sites, and the potential routes for the approximately 8- *to 10*-inch treated water pipeline (pipeline between the potential treatment sites and the new CUP). The impacts analysis provided in this Draft EIR for the CUP-RP addresses the impacts associated with construction of an off-site water treatment plant at either of the two locations and installation of associated pipeline to the CUP. Although a schedule for construction of the treatment plant and pipeline, should the system be approved for implementation, has not yet been determined, the EIR impacts analysis assumes a construction duration of approximately one-year beginning in *late 2010 or* early 2011. This assumption would put construction of the recycled/reclaimed water system concurrent with other components of the CUP-RP, thereby providing a conservative analysis as compared to assuming construction of the subject water system occurs sometime after the rest of the CUP-RP is completed.

2. The following text is hereby added after the last paragraph of Section 2.2.2 Potential Off-Site Recycled/Reclaimed Water Facilities on page 2-11 of the Draft EIR:

> *Site 1 is currently the preferred site for the location of the recycled/reclaimed water treatment system and LAWA is preparing lease agreements for LADWP to utilize the subject site.*

3. The text of Section 2.4.5 Replacement of Existing Direct-Burial Chilled Water and Hot Water Serve Lines on page 2-19 of the Draft EIR is hereby revised as follows:

> The existing direct-buried chilled water and hot water service lines in the CTA loop roadway would be removed and replaced. Existing chilled and hot water lines that are "exposed" during excavation would be removed. The balance of "out of service" chilled and hot water lines would be surveyed, filled with concrete slurry and abandoned in place. The new chilled water and hot water service lines would be routed into a new utility tunnel/corridor (Utilidor) *that extends west from the replacement CUP* and *as "direct-bury" pipelines east of the replacement CUP* ~~distributed to the terminals~~. *In conjunction with the placement of new chilled and hot water pipes, other utility lines of a linear nature, such as new electrical and communication duct banks, new reclaimed water pipelines*,[1] *new*

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[1] *The reclaimed water line to be included among the other types of water lines within the proposed utility corridor provides for the future possibility of using recycled/reclaimed water within the CTA. As indicated in Section 2.4.8, LAWA and LADWP are jointly pursuing the potential use of recycled/reclaimed water at LAX. As part of the CUP-RP, LAWA and LADWP are working on plans for a pipeline and treatment plant that would enable the proposed replacement CUP to use recycled/reclaimed water. As other efforts by LAWA and LADWP, separate from the CUP-RP, may occur in the future to further increase the use of recycled/reclaimed water at LAX, the availability of water lines within the CTA that are specifically designed to accommodate*

potable water pipelines, and new fire water pipelines, would be co-located with the Utilidor/trench. The~~se~~ *Utilidor* tunnels would be approximately 15 feet high by 15 feet wide to accommodate the anticipated piping needs*, with the power and communication ducts adjacent to the Utilidor structure within the same trench*.

The Utilidor is essentially a subsurface concrete box that would require an approximately 22-foot-wide trench to accommodate the placement of forms for poured concrete or the placement of concrete panels. *The adjacent power and communication ducts would require an additional 10 feet of width, providing for an overall trench width of approximately 32 feet, as assumed in the Draft EIR impacts analysis. Adjacent to the CUP, the Utilidor system would be split to utilize both Center Way North and Center Way (south), thereby providing for much smaller trenches (i.e., placement of the new utility lines would be split between the two parallel segments) than otherwise required for the other segments that include all the utility line improvements within a single trench. A single small trench on the east side of Parking Structure P-3 between Center Way and Terminal 1 would be used for a two-foot by eight-foot power duct.* Total estimated excavation (cut and fill) for the Utilidor that would extend west from the replacement CUP would be approximately ~~143,500~~*157,850* cubic yards (cy). Due to the relative inflexibility of the concrete tunnel, the Utilidor would be constructed in long straight runs, and may require the relocation of exiting underground facilities that crisscross the area. Connections from the main trunk line of the Utilidor to the terminal buildings would require trenches to be excavated across the entire width of World Way and would require trenching across West Way at three separate locations, including through the middle and at the intersections of West Way/World Way North and Westway/World Way South. Reinforced steel decking would be used over portions of the Utilidor trenches to bridge the trench and allow construction to occur while also permitting traffic to continue to use the roadways during peak airport traffic conditions. **Figure 2-7** shows the conceptual alignments of the anticipated pipeline replacements/improvements.

The connection of new pipelines to the chilled and hot water systems within existing buildings would include replacement of existing older equipment located in and near the mechanical equipment rooms, such as pumps, piping, energy transfer stations, heat exchangers, instrumentation and controls, valves, and electrical equipment.

4. Figure 2-7 on page on page 2-21 of the Draft EIR has been revised to reflect the utility line alignments including the water lines and power communication ducts. Please see the following revised figure.

5. The text of Section 2.4.8 Potential Off-Site Reclaimed Water Treatment System Sites on pages 2-20 and 2-23 of the Draft EIR is hereby revised as follows:

LAWA is *designing the new cooling towers to accept* ~~evaluating the feasibility of utilizing~~ recycled/reclaimed water from LADWP as process/make-up water within the proposed system (i.e., water for the cooling tower system). Discussions are currently underway between LAWA and LADWP to establish a pipeline to convey recycled/reclaimed water from an existing 24-inch line to the north and east of LAX to the replacement CUP. A treatment system would be required to *reduce the* ~~remove~~ *corrosiveness* ~~chlorine and ammonia from~~ *of* the recycled/reclaimed water*, as well as reduce the potential for water borne odors*. ~~The pipeline alignment and location of a treatment system have not yet been determined. However, the pipeline would likely extend through the CTA and along existing street rights-of-way to the north and east of the new CUP. Two locations on LAWA-owned property are currently under preliminary consideration, including Sites 1~~

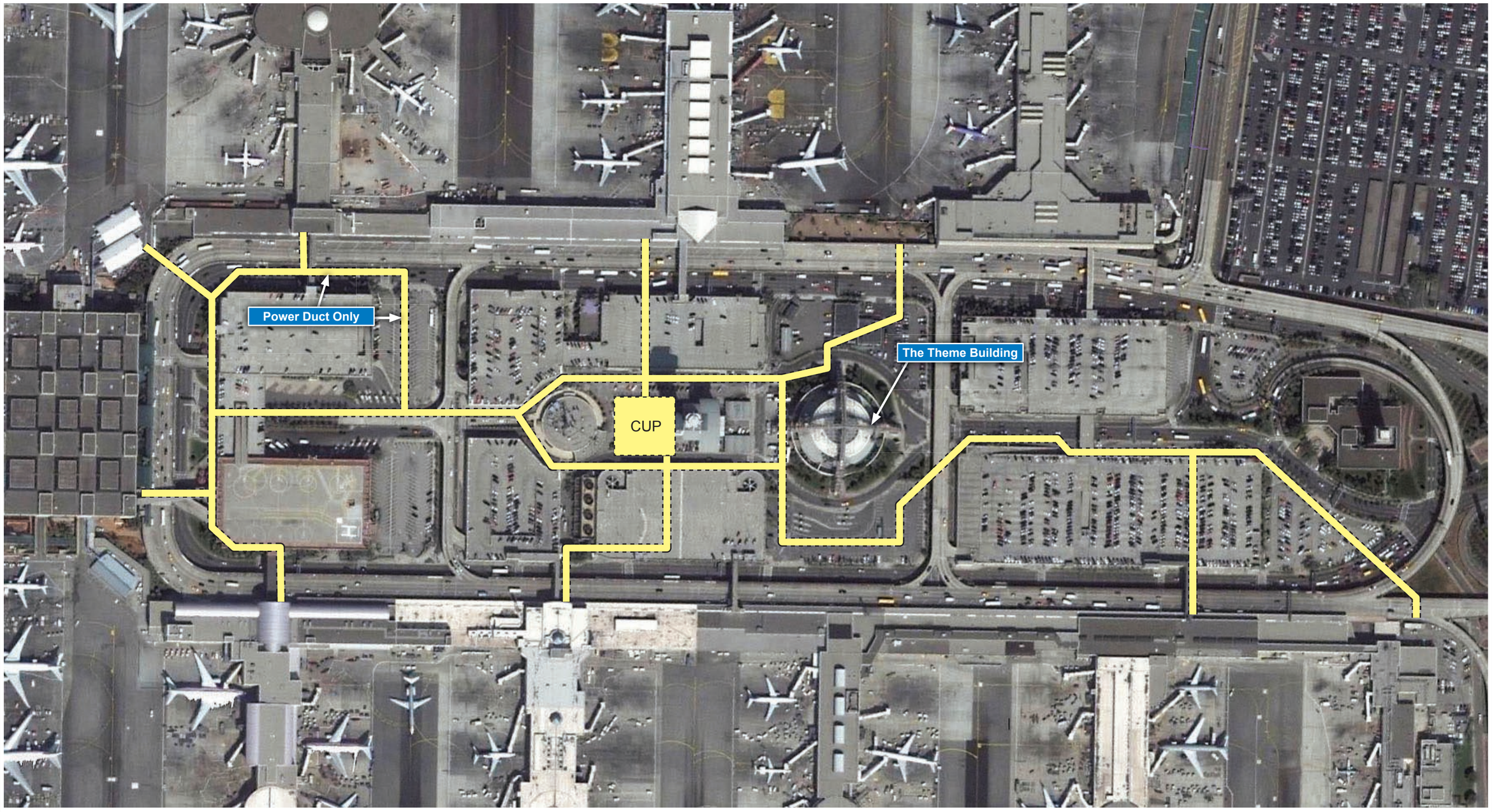
recycled/reclaimed water will facilitate those efforts. It is more cost effective and less disruptive to include water lines dedicated to the potential future use of recycled/reclaimed water in conjunction with the placement of other linear utility lines currently being proposed.

~~and 2, discussed above (see Figure 2-4).~~ The treatment system *for water softening (i.e., reduction in corrosive minerals) is planned to* ~~would~~ include *a series of five fiberglass reinforced above-ground tanks, each being approximately four feet in diameter and eight to ten feet tall. The five tanks would occupy a footprint of approximately 15 feet by 45 feet (675 square feet).* ~~a 3,000- to 6,000-square-foot, 15- to 20-foot-high building to house the treatment equipment. The building size would depend on the type of treatment method that is used. One or two above-grade treated water storage tanks would be located outside of the building. Although storage tanks have not yet been designed, it is anticipated that the above-ground tanks would be approximately eight feet in diameter and 15 feet in height.~~ The treatment system would also contain a small~~, 12~~ *16*-foot by *16*~~12~~-foot building to house a chlorination system to prevent the potential for water odor to emanate during the evaporative process of the cooling tower system. *The chlorination system is planned to use bulk 12.5% sodium hypochlorite solution and include a 400-gallon storage tank*, *a chemical feeding system, sampling and metering pumps, and a residual analyzer and piping to allow for sufficient chlorine contact time for chlorine residual analysis. It would be a self sufficient, automatically operating disinfection system to maintain chloride residual levels. Room for truck access would* ~~ill~~ *be included to allow for maintenance and chemical/equipment delivery.* ~~The total area required for the treatment facility would be approximately 14,000 square feet. Installation of the treatment system on a corner lot would allow truck access from two streets. The two sites are shown in the previously cited **Figure 2-4**.~~

*Two locations on LAWA-owned property are under consideration for the treatment system, including Sites 1 and 2 discussed above (see **Figure 2-4**), with the current preference being toward Site 1.* As shown in **Figure 2-4**, *both sites are located east of the airport, with* Site 2 *being* ~~is~~ located along the route of the existing 24-inch line *and Site 1 being approximately 1,500 feet west of the existing line*. ~~However, a~~ *A* new approximately 8- *to 10*-inch pipeline would be required from either Site 1 or Site 2 to convey treated water to the CUP site. Any new pipeline would be located within existing street rights-of-way. With the selection of the potential treatment Site 1, a water line would be needed to convey recycled/reclaimed water from the existing 24-inch recycled/reclaimed water pipeline to the treatment *system*, although a line to convey treated water from the treatment *system* ~~plant~~ to the new CUP would be shorter in distance than from Site 2. *LAWA would be responsible for installation of the pipeline segment between the CUP and the eastern boundary of the airport, at Sepulveda Boulevard, and LADWP would be responsible for installation of the pipeline segment between Sepulveda Boulevard and the selected treatment system site.* ~~The installation of the pipeline and treatment system would be the responsibility of LAWA or LADWP individually, or in combination.~~

6. The third to last sentence in the last paragraph under Section 2.5 Construction Phasing and Schedule on page 2-24 of the Draft EIR has been revised as follows:

Construction of new approximately 8-inch recycled/reclaimed water lines would require approximately 2,188 cy of cut and fill and new utility line tunnels (utilidor) would require approximately *205,350* ~~168,500~~ cy of cut and fill. Total excavation (cut and fill) for the proposed project would be *273,538* ~~236,688~~ cy of soil.



north
Not to Scale

Source: HNTB, CDM, 2009.
Prepared by: CDM, 2009.

LAX Central Utility Plant Replacement Project Draft EIR	**Conceptual Alignment of Chilled Water and Hot Water Service Lines (Utilidor)**	Figure **2-7**

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7. The list of Miscellaneous Actions and Permits on page 2-25 of the Draft EIR is hereby revised to include the following permit:

- *Los Angeles Department of Public Works, Bureau of Engineering B-Permit for all construction activities within the Central Outfall Sewer (COS) easement.*

Chapter 4, Setting, Environmental Impacts, and Mitigation Measures

1. Figure 4.1-6 on page 4-39 of the Draft EIR has been revised to clarify that the Northwest Construction Staging Area is no longer proposed to be a primary contractor employee parking area for the Bradley West Project. Please see the following revised figure.

2. The following text is hereby added to the end of the first bullet on page 4-75 of the Draft EIR:

The following provides the full text of LAX Master Plan Mitigation Measure MM-AQ-1:

MM-AQ-1. LAX Master Plan - Mitigation Plan for Air Quality. *LAWA shall expand and revise the existing air quality mitigation programs at LAX through the development of an LAX Master Plan Mitigation Plan for Air Quality (LAX MP-MPAQ). The LAX MP-MPAQ shall be developed in consultation with the FAA, the U.S. Environmental Protection Agency (USEPA), the California Air Resources Board (CARB), and the South Coast Air Quality Management District (SCAQMD), as appropriate, and shall include all feasible methods to reduce air pollutant emissions from aircraft, Ground Support Equipment (GSE), traffic, and construction equipment both on and off the airport. The goal of the LAX MP-MPAQ shall be to reduce potential air pollutant emissions associated with implementation of the LAX Master Plan to levels equal to, or less than, the thresholds of significance identified in the Final EIS/EIR for the project. At a minimum, air pollutant emissions associated with implementation of the LAX Master Plan will be reduced to levels equal to those identified in* ***Table AD5-8****, Total Operational and Construction Emission - Mitigated. The LAX MP-MPAQ shall include feasible mitigation* measures *that are grouped into the following three (3) categories:*

1. *Construction-Related Measure;*
2. *Transportation-Related Measure; and*
3. *Operations-Related Measure.*

The LAX MP-MPAQ will, initially, present the basic framework of the overall air quality mitigation program (basic LAX MP-MPAQ), and will, ultimately, define the specific measures to be implemented within the context of three (3) individual components specific to the categories of emissions indicated above (full LAX MP-MPAQ). Implementation of Mitigation Measure MM-AQ-2, Construction-Related Mitigation Measure, will define the specific measures to be included in the construction-related component; Mitigation Measure MM-AQ-3, Transportation-Related Mitigation Measure, will define the specific measures to be included in the surface transportation-related component; and Mitigation Measure MM-AQ-4, Operations-Related Mitigation Measure, will define the specific measures to be included in the operations-related component. The basic framework of the LAX MP-MPAQ and the Construction-Related component will be developed prior to initiation of construction activities for the first project to be developed under the LAX Master Plan, and the development of the other two components will occur in conjunction with implementation of the Master Plan components that materially affect surface transportation emissions and operations emissions.

Table AD5-8

Total Operational and Construction Emissions - Mitigated (tons per year)

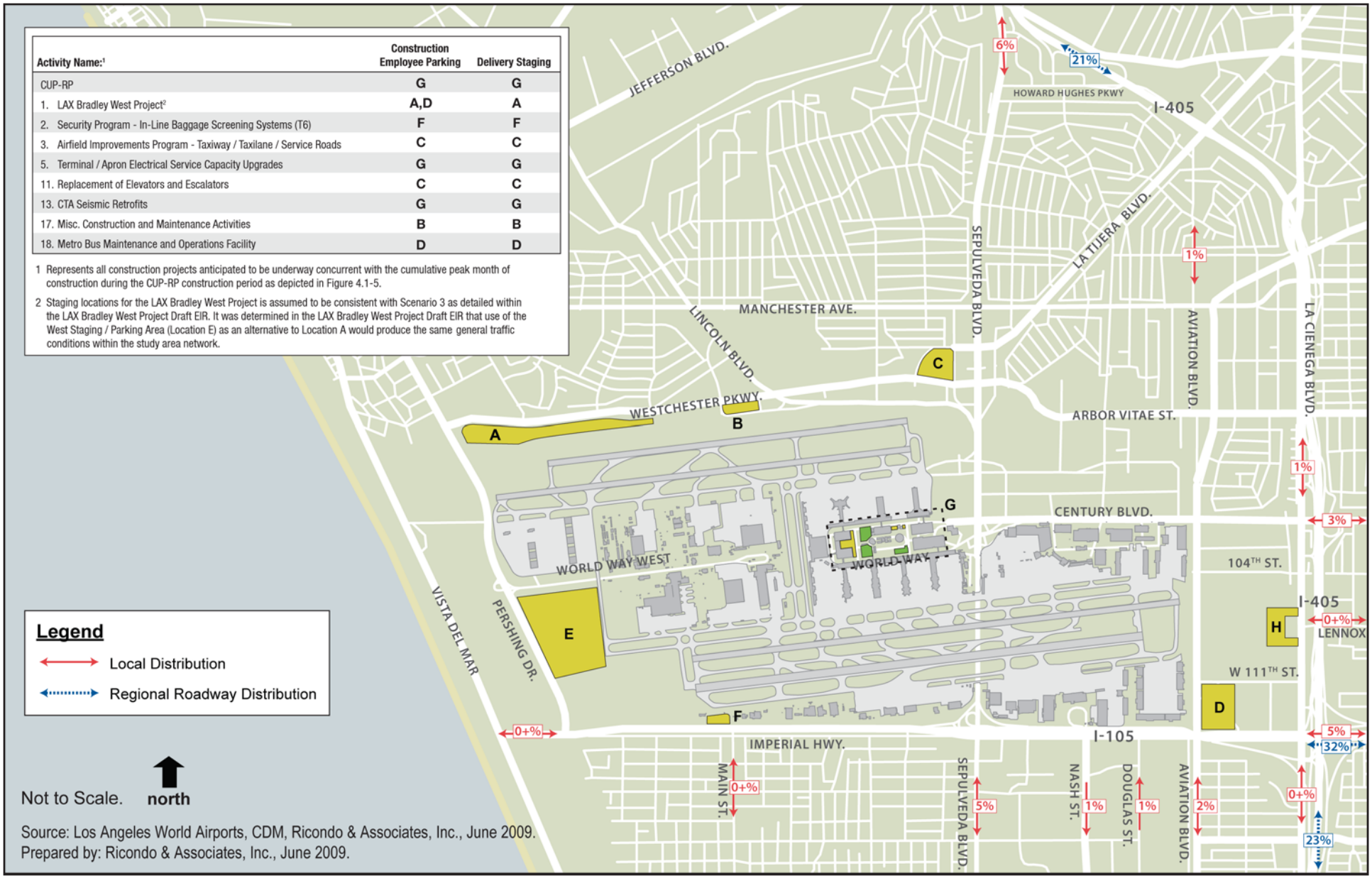
	Interim Year					Horizon Year 2015				
Pollutant and Source	**NA/NP[1,2]**	**A**	**B**	**C**	**D**	**NA/NP[1]**	**A**	**B**	**C**	**D**
VOC - On-Airport	1,652	1,385	1,330	1,384	1,513	1,513	1,497	1.578	1,534	1,473
VOC - Off-Airport	2,795	2,286	2,261	2,163	1,365	1,606	1,282	1,271	1,270	1,091
VOC - Construction	909	170	148	155	86	-	44	39	40	-
VOC - Total	5,356	3,841	3,739	3,702	2,964	3,119	2,823	2,888	2,844	2,564
CO - On-Airport	11,842	9,555	9,459	9,578	9,077	9,451	9,053	9,553	9,412	8,266
CO - Off-Airport	31,114	29,405	29,385	28,691	16,719	15,188	16,368	16,227	16,336	13,166
CO - Construction	667	1,094	955	995	556	-	352	307	320	-
CO - Total	43,623	40,054	39,799	39,264	26,352	24,639	25,773	26,087	26,068	21,432
NO_X- On-Airport	6,356	5,504	5,503	5,543	5,760	5,729	6,357	6,440	5,999	5,474
NO_X- Off-Airport	4,665	4,420	4,514	4,463	2,628	2,368	2,723	2,718	2,741	2,102
NO_X- Construction	405	2,237	1,952	2,034	1141	-	494	431	449	-
NO_X- Total	11,426	12,161	11,969	12,040	9,529	8,097	9,574	9,589	9,189	7,576
SO_2 - On-Airport	405	382	382	382	436	449	494	513	489	436
SO_2 - Off-Airport	52	50	51	50	24	27	30	30	30	24
SO_2 - Construction	3	7	7	7	3	-	2	2	2	-
SO_2 - Total	460	439	440	439	463	476	526	545	521	460
PM_{10} - On-Airport	181	128	126	132	182	167	165	168	158	177
PM_{10} - Off-Airport	1,617	1,833	1,603	1,572	1,752	1,780	2,089	2,078	2,060	1,658
PM_{10} - Construction	68	531	463	482	335	-	137	119	124	-
PM_{10} - Total	1,866	2,492	2,192	2,186	2,269	1,947	2,391	2,365	2,342	1,835

[1] *NA/NP=No Action/No Project Alternative.*

[2] *As described in the introduction to Chapter 4, the evaluation of mitigation measures is not a part of the No Action/No Project Alternative analysis. Emissions provided in this table for the No Action/No Project Alternative are the same as those reported in* ***Table F4.6-11a*** *and have been included here for comparative purposes.*

[3] *Interim year is 2005 for NA/NP and Alternatives A, B, and C and 2013 for Alternative D.*

Source: Camp Dresser & McKee Inc., 2004.



Source: Los Angeles World Airports, CDM, Ricondo & Associates, Inc., June 2009.
Prepared by: Ricondo & Associates, Inc., June 2009.

LAX Central Utility Plant Replacement Project Draft EIR

Employee Parking and Staging Locations for Central Utility Plant Project and Other Projects at Construction Peak

Figure **4.1-6**

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3. Table 4.2-10 on pages 4-76 and 4-77 of the Draft EIR is hereby revised as follows:

Table 4.2-10

Construction-Related Air Quality Mitigation Measures

Measure	Type of Measure
Post a publicly visible sign with the telephone number and person to contact regarding dust complaints; this person shall respond and take corrective action within 24 hours.	Fugitive Dust
Prior to final occupancy, the applicant demonstrates that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.	Fugitive Dust
All roadways, driveways, sidewalks, etc. being installed as part of the project should be completed as soon as possible; in addition, building pads should be laid as soon as possible after grading.	Fugitive Dust
Pave all construction access roads at least 100 feet on to the site from the main road.	Fugitive Dust
To the extent feasible, have construction employees' work/commute during off-peak hours.	On-Road Mobile
Make available on-site lunch trucks during construction to minimize off-site worker vehicle trips.	On-Road Mobile
Prohibit staging and parking of construction vehicles (including workers' vehicles) on streets adjacent to sensitive receptors such as schools, daycare centers, and hospitals.	Nonroad Mobile
Prohibit construction vehicle *and engine* idling in excess of *five* ~~ten~~ minutes *and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449*.	Nonroad Mobile
Specify ~~combination of~~ *conditions for* electricity service from power poles ~~and portable diesel or gasoline fueled generators using "clean burning diesel" fuel and exhaust emission controls~~ *for electrification of service equipment and auxiliary power units at the facility. Auxiliary power units, such as portable diesel or gasoline fueled generators, shall use "clean burning diesel" (i.e., low sulfur) and exhaust emission controls as feasible and appropriate.*	Stationary Point Source Controls
Suspend use of all construction equipment during a second-stage smog alert in the immediate vicinity of LAX.	Mobile and Stationary
Utilize construction equipment having the minimum practical engine size (i.e., lowest appropriate horsepower rating for intended job).	Mobile and Stationary
Require that all construction equipment working on-site is properly maintained (including engine tuning) at all times in accordance with manufacturers' specifications and schedules.	Mobile and Stationary
Prohibit tampering with construction equipment to increase horsepower or to defeat emission control devices.	Mobile and Stationary
The contractor or builder shall designate a person or persons to ensure the	Administrative

Table 4.2-10

Construction-Related Air Quality Mitigation Measures

Measure	Type of Measure
implementation of all components of the construction-related measure through direct inspections, record reviews, and investigations of complaints.	

Source: CDM, 2009.

4. The following text is hereby added after the end of Table 4.2-10 on page 4-77 of the Draft EIR:

The following provides the full text of LAX Master Plan Mitigation Measure MM-AQ-2, as modified by correction 4 above:

MM-AQ-2. Construction-Related Measure. *The required components of the construction-related air quality mitigation measure are itemized below. These components include numerous specific actions to reduce emissions of fugitive dust and of exhaust emissions from on-road and nonroad mobile sources and stationary* engines*. All of these components must be in place prior to commencement of the first Master Plan construction project and must remain in place through build out of the Master Plan. An implementation plan will be developed which provides available details as to how each of the elements of this construction-related mitigation measure will be implemented and monitored. Each construction subcontractor will be responsible to implement all measures that apply to the equipment and activities under his/her control, an obligation which will be formalized in the contractual documents, with financial penalties for noncompliance. LAWA will assign one or more environmental coordinators whose responsibility it will be to ensure compliance with the construction-related measure by use of direct inspections, records reviews, and investigation of complaints with reporting to LAWA management for follow-up action. The estimated ranges of emissions reductions quantified for this mitigation measure for Alternative D are shown in* ***Table F5-8****, Estimated Ranges of Emission Reductions for Construction-Related Air Quality Mitigation Measures. Reliable emissions reductions were not able to be quantified for all of these components.*

Table F5-8

Estimated Ranges of Emissions Reductions for Construction-Related Air Quality Mitigation Measures

Pollutant	*Alternatives A, B, C, and D[1] (tons)*
ROG	*1 - 10*
NO_X	*300 - 1,100*
CO	*10 - 30*
PM_{10}	*140 - 400*
SO_X	*1 - 10*

[1] *In the year of peak construction emissions.*

Source: Camp Dresser & McKee Inc., 2004.

The specific components of this construction-*related air quality mitigation measure include:*

1. *Fugitive Dust Source Controls:*

- *Apply non-toxic soil stabilizer to all inactive construction areas (i.e., areas with disturbed soil).*
- *Following the addition of materials to, or removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing non-toxic soil stabilizer.*
- *Post a publicly visible sign with the telephone number and person to contact regarding dust complaints; this person shall respond and take corrective action within 24 hours.*
- *Prior to final occupancy, the applicant demonstrates that all ground surfaces are covered or treated sufficiently to minimize fugitive dust emissions.*
- *All roadways, driveways, sidewalks, etc. being installed as part of project should be completed as soon as possible; in addition, building pads should be laid as soon as possible after grading.*
- *Pave all construction access roads at least 100 feet on to the site from the main road.*

2. *On-Road Mobile Source Controls:*

- *To the extent feasible, have construction employees work/commute during off-peak hours.*
- *Make available on-site lunch trucks during construction to minimize off-site worker vehicle trips.*

3. *Nonroad Mobile Source Controls:*

- *Prohibit staging or parking of construction vehicles (including workers' vehicles) on streets adjacent to sensitive receptors such as schools, daycare centers, and hospitals.*
- *Prohibit construction vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449.*
- *Utilize on-site rock crushing facility, when feasible, during construction to reuse rock / concrete and minimize off-site truck haul trips.*

4. *Stationary Point Source Controls:*

- *Specify conditions for electricity service from power poles for electrification of service equipment and auxiliary power units at the facility. Auxiliary power units, such as portable diesel or gasoline fueled generators, shall use "clean burning diesel" (i.e., low sulfur) and exhaust emission controls as feasible and appropriate.*

5. *Mobile and Stationary Source Controls:*

- *Specify combination of construction equipment using "cleaner burning diesel" fuel and exhaust emission controls.*
- *Suspend use of all construction equipment during a second-stage smog alert in the immediate vicinity of LAX.*
- *Utilize construction equipment having the minimum practical engine size (i.e., lowest appropriate horsepower rating for intended job).*
- *Require that all construction equipment working on site is properly maintained (including engine tuning) at all times in accordance with manufacturers' specifications and schedules.*
- *Prohibit tampering with construction equipment to increase horsepower or to defeat emission control devices.*

6. Administrative Controls

The contractor or builder shall designate a person or persons to ensure the implementation of all components of the construction-related measure through direct inspections, records reviews, and investigations of complaints.

5. The second sentence of the third paragraph under the heading "Localized Significance" on page 4-79 of the Draft EIR is hereby revised as follows:

The closest alternative location to a sensitive receptor is Site *2* ~~3~~, which is approximately *350* ~~200~~ meters from homes to the north.

Chapter 5, Other Environmental Considerations

1. Footnote 163 on page 5-4 of the Draft EIR under Section 5.5 Environmental Effects Determined not to be Significant has been revised as follows:

The Initial Study concluded that the ~~CUO~~*CUP*-RP would result in a potentially significant impact on cultural resources and noise, however, these potential impacts would be reduced to a less than significant level with ~~the incorporation~~ *implementation* of the *LAX Master Plan Commitments and M*~~m~~itigation *M*~~m~~easures that ~~are described in the NOP (see NOP, Attachment A)~~ *have been incorporated into the project.*

Chapter 6, Alternatives

1. The last sentence of the first paragraph under Section 6.2 Significant Impacts of the Project on page 6-2 of the Draft EIR is hereby revised as follows:

As all feasible mitigation *measures are* proposed for implementation, impacts are considered to be significant and unavoidable.

2. The first paragraph under Section 6.4.2.2 Direct Burial Alternative on page 6-4 of the Draft EIR is hereby revised as follows:

The Direct Burial Alternative would change the construction technique (Utilidor) for the development of the new ~~chilled water and hot water~~ utility corridor, extending west from the proposed replacement CUP, that would serve the CTA. Under this alternative, pipelines *and ducts* extending west from the CUP would be installed in ~~a~~ buried conduit*s* along similar paths as those defined for the proposed Utilidor. However, the concrete, box-like tunnel required for the Utilidor would not be constructed and, as such, the Direct Burial Alternative would have greater flexibility of design and require less excavation than the proposed Utilidor. This alternative has the potential to reduce impacts associated with dust, equipment emissions, and other impacts associated with construction activities.

3. The first paragraph under Section 6.4.3.2 Direct Burial Alternative on page 6-5 of the Draft EIR is hereby revised as follows:

The Direct Burial Alternative would change the construction technique used in the development of the underground alignment for the ~~chilled water and hot water pipe~~ *utility* lines extending west from the replacement CUP. Under the Direct Burial Alternative, *pipe*lines for chilled water and hot water ~~lines~~*, as well as other linear utility lines,* extending west from the CUP would be placed directly in trenches. This technique is an alternative to the construction of the proposed Utilidor, described in Section 2.4.5 of the Project Description. The Utilidor is a concrete tunnel that would contain the chilled water and hot water pipelines*, as well as other water lines,* and in which concrete panels must be placed or poured. The Direct Burial Alternative would require less clear space in the excavation of the trench than under the Utilidor and would have greater flexibility than the Utilidor. Under the Direct Burial Alternative, the proposed utility corridor path would be modified to include the construction of direct bury utility conduits from the CUP to the

LAWA Switching Station to the east, and would use existing tunnels south of Center Way along World Way to connect with the Tom Bradley International Terminal (TBIT) and Terminal 4. ~~The Direct Burial Alternative would also differ slightly from the proposed Utilidor path in that no new connection to Terminal 3 would be made along World Way North.~~ In addition, the Direct Burial Alternative would create a closed loop encompassing Parking Structure 3 with conduit running along Center Way, World Way, World Way North and through the surface lot east of Parking Structure 3. Under this new alignment, the direct burial alternative would cross World Way North at two locations, both located between TBIT and Terminal 3. Under the proposed Utilidor construction process, connections from the main trunk line of the Utilidor to the terminal buildings would require trenches to be excavated across the entire width of World Way at three separate locations: the middle of West Way; at the intersection of West Way and World Way North; and at the intersection of West Way and World Way South. The Direct Burial Alternative would require trenching across West Way in two locations: across the middle of West Way and at the intersection of West Way/World Way North. The Direct Burial Alternative would not require trenching across the intersection of West Way/World Way South. Additionally, the Direct Burial Alternative would use a boring construction method beneath World Way that would limit impacts on CTA traffic, since it would require no trenching across the width of World Way.

4. The second paragraph under Section 6.4.3.2 Direct Burial Alternative on page 6-6 of the Draft EIR is hereby revised as follows:

> Under the Direct Burial Alternative, connecting the chilled water and hot water lines *and other water lines* with TBIT and Terminal 4 would be made using existing tunnels. Under the Utilidor method, the accommodation of forms for poured concrete or the placement of concrete panels would require a larger trench (approximately 32 feet wide *plus approximately 10 feet for the power and communication ducts*) than under the Direct Burial Alternative. The Direct Burial Alternative assumes the *typical* excavation for utility conduits would range from between *approximately six* ~~two~~ and *thirty* ~~nineteen~~ feet in width, at varying depths. Excavation (cut and fill) for pipelines extending west from the replacement CUP with the Direct Burial Alternative would be approximately ~~23,500~~ *44,650* cubic yards (cy), a substantial reduction when compared to the approximately ~~143,500~~ *157,850* cy required for the proposed Utilidor.

5. Figure 6-1 on page 6-7 of the Draft EIR has been revised to reflect the utility line alignments, including the water lines and power communication ducts. Please see the following revised figure.

6. The following text is hereby added after the second full paragraph on page 6-6 of the Draft EIR:

> *Due to reduced construction requirements associated with the Direct Burial Alternative, the cost of the construction of the Direct Burial Alternative would be substantially less than the cost of construction of the proposed Utilidor. Although the Utilidor would have less long-term maintenance cost due to the location of pipes within a protective and accessible concrete tunnel, the Direct Burial Alternative would minimize long-term maintenance costs through the following design technologies: (1) factory insulated pipe (a recent technology that is superior to that previously available); (2) lines running to vaults that would be installed at strategic locations to give greater access; and (3) installation of additional duct bank and piping that would go into service at a later time to avoid future disruptions of the CTA. With the installation of these features, the difference in long-term maintenance costs between the Utilidor and the Direct Burial Alternative would be substantially less than the difference between the construction cost of the Utilidor and the Direct Burial Alternative. Therefore, the Direct Burial Alternative would be considerably more economical than the Utilidor option.*

7. The second sentence in the first paragraph under the heading Construction Ground Transportation on page 6-6 of the Draft EIR is hereby revised as follows:

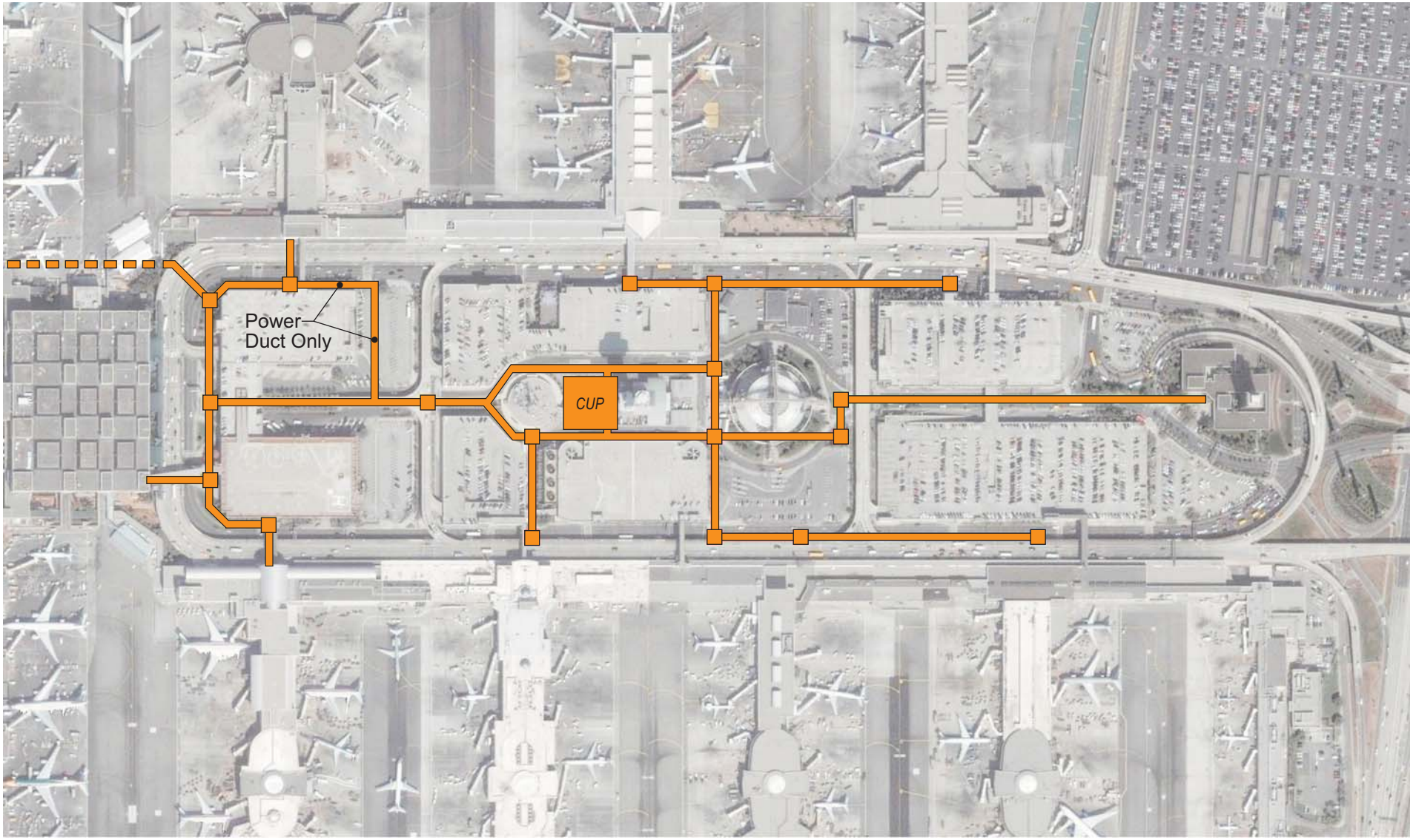
> The Direct Burial Alternative assumes the *typical* excavation for utility conduits would range from between *approximately six*~~two~~ and *thirty*~~nineteen~~ feet in width, at varying depths.

8. The last paragraph under Section 6.4.3.2 Direct Burial Alternative - Construction Ground Transportation on page 6-9 of the Draft EIR is hereby revised as follows:

> The anticipated schedule for the Direct Burial Alternative estimates that *125*~~83~~ peak day employees would be necessary to perform the required construction. The peak construction period would occur in the first quarter of 2011, approximately 17 months into the construction program. The *125*~~83~~ peak day employees are projected to generate *108*~~72~~ two-way peak hour vehicle trips (i.e., *108*~~72~~ inbound trips and *108*~~72~~ outbound trips).[169] In comparison, the schedule for the proposed Utilidor construction technique estimates that 168 peak day employees would be required to perform installation of the utility corridor. The 168 peak day employees are projected to generate 146 two-way peak hour trips.[170] The peak construction period would to occur in the third quarter of 2010, approximately 11 months into the construction program. The distribution of estimated monthly employee hours over the period of project construction indicates that the differences in the schedules associated with the construction of the Utilidor or Direct Burial Alternative would occur during the first 18 months of construction, after which time the traffic activity associated with the construction would be the same under both the proposed project and Direct Burial Alternative. Throughout the initial 18-month period of construction, the traffic associated with the Direct Burial Alternative would be lower than the traffic associated with the proposed Utilidor construction. Furthermore, based on the traffic volumes describe above, the peak hour construction employee traffic volume associated with the Direct Burial Alternative would be *27*~~49~~ percent *less than*~~of~~ the peak traffic activity associated with the proposed Utilidor construction (i.e., *108*~~72~~ peak hour employee trips for direct burial / 146 peak hour employee trips for the Utilidor).

9. Footnote 169 on page 6-9 of the Draft EIR is hereby revised as follows:

[169] U.S. Cost, LAX Central Utility Plant (CUP) Phase 1 and 2 (Direct Burial Piping / Electrical Ductbanks) Resource Loaded Schedule, June 26, 2009*, as adjusted upwards to account for additional grading for other utility lines, which would result in an approximately fifty percent increase in daily construction activity level*.



north

Source: CDM, 2009.
Prepared by: PCR, June 2009.

LAX Central Utility Plant Replacement Project Draft EIR	Utility Alignments - Direct Burial Alternative	Figure 6-1

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10. Tables 6-1 and 6-2 on page 6-11 of the Draft EIR are hereby revised as follows:

Table 6-1

Direct Burial Alternative:
Maximum Controlled Peak CUP-RP Daily Construction Emissions

Pollutant	Project Max	SCAQMD Significance Threshold	Emissions Exceed Threshold?
Maximum Daily Emissions, Controlled (lb/day)[1]			
Carbon monoxide, CO	*237* ~~208~~	550	No
Volatile organic compounds, VOC	*62* ~~55~~	75	No
Nitrogen oxides, NO_x	*412* ~~363~~	100	Yes
Sulfur dioxide, SO_2	0	150	No
Respirable particulate matter, PM10	*54* ~~47~~	150	No
Fine particulate matter, PM2.5	*25* ~~22~~	55	No

[1] "Controlled" includes emission reduction measures required by regulation (e.g., SCAQMD Rule 403), or the LAX Master Plan Community Benefits Agreement (construction equipment diesel particulate filters). These reductions are part of the project design.

Source: CDM, 2009.

Table 6-2

Controlled Air Pollutant Concentrations for Peak Year of CUP-RP Construction (2010) for Direct Burial Alternative

Pollutant Concentration	Averaging Period	CAAQS/NAAQS	Project and Background	Exceed AAQS?
NO_2 (µg/m^3)	Annual	57/100	~~33~~*36*	No
	1-hr	339/NA	~~239~~*265*	No
		SCAQMD Significance Threshold	**Project**	**Exceed Threshold?**
PM10 (µg/m^3)	Annual	1.0	~~0.5~~*0.9*	No
PM10 (µg/m^3)	24-hr	10.4	~~5.3~~*7.7*	No

Sources: CDM, 2009.

11. The first paragraph under the heading Human Health Risk on page 6-11 of the Draft EIR is hereby revised as follows:

> **Table 6-3** provides the decrease in emissions of pollutants associated with health risk for the Direct Burial Alternative as compared to emissions estimated in the CUP-RP impact assessment described in Section 4.2. Annual emissions, from which cancer and chronic non-cancer health risks are assessed, are ~~23~~ *1* percent to ~~99~~ *98* percent less than those under the proposed project. Maximum peak hourly emissions for the Direct Burial Alternative from the various source categories (on-road, off-road, dust) are ~~22~~ *13* percent to ~~71~~ *53* percent lower than the emissions from the proposed project. The resultant chronic and acute health risks are discussed below.

12. Table 6-3 on page 6-12 of the Draft EIR is hereby revised as follows:

Table 6-3

Comparison of Emission Rates from CUP-RP and Direct Burial Alternative

Pollutants Associated with Health Risk	Off-road Diesel	On-road Diesel	Construction Dust	Road Dust
Chronic PM10	~~34~~*18*%	~~23~~*15*%	~~99~~*84*%	~~23~~*15*%
Acute PM10	~~63~~*58*%	~~23~~*15*%	~~71~~*55*%	~~23~~*15*%
Chronic VOC	~~30~~*14*%	~~23~~*15*%	NA	NA
Acute VOC	~~2~~56%	~~23~~*15*%	NA	NA
Criteria Pollutants				
All pollutant average *for peak day*	~~62~~*54*%	~~23~~*15*%	~~81~~*55*%*	~~23~~*15*%

**PM10 and PM2.5 only*

Source: CDM, 2009.

13. The second full paragraph on page 6-12 of the Draft EIR is hereby revised as follows:

> For this alternative, project-related cancer risks for residents and school children are predicted to be lower than risks predicted for the proposed project. Estimated cancer risks for adult residents and child residents for the CUP-RP alternative construction with mitigation are ~~1.3~~ *1.6* in one million and ~~0.4~~ *0.5* in one million, respectively. Estimated cancer risk from Direct Burial Alternative construction sources for a young child through adulthood (adult + child) at the modeled location with maximum construction cancer risks is ~~1.6~~ *2.0* in one million. Exposure to diesel particulate matter released during construction would contribute about 97 percent of cancer risks for adults and children. Estimated cancer risk for school children are estimated to be 0.04 in one million. Impacts are below the thresholds of significance for residents and school children.

14. The first sentence of the third full paragraph on page 6-12 of the Draft EIR is hereby revised as follows:

> Cancer risks for adult workers under the Direct Burial Alternative are estimated to be approximately ~~13~~*14* in one million from exposure to TACs resulting from construction.

15. The last sentence of the fourth full paragraph on page 6-12 of the Draft EIR is hereby revised as follows:

> Hazard indices for child residents, school children, adult residents and workers are ~~0.005~~ *0.006*, ~~0.0004~~ *0.0005*, ~~0.001~~ *0.002* and ~~0.02~~ *0.03*, respectively.

16. Tables 6-4 and 6-5 on page 6-13 of the Draft EIR are hereby revised as follows:

Table 6-4

Cancer Risks and Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals for CUP-RP Direct Burial Alternative

	Construction	
Receptor Type	**Uncontrolled**	**Controlled**
Cancer Risks[1,2] (per million people)		
Child Resident	*0.54*~~0.43~~	*0.51*~~0.4~~
School Child	*0.047*~~0.037~~	*0.044*~~0.035~~
Adult + Child Resident[3]	*2.1*~~1.7~~	*2.0*~~1.6.~~
Adult Resident	*1.8*~~1.4~~	*1.6*~~1.3~~
Adult Worker	*15.5*~~13.7~~	*14.4*~~12.7~~
Non-Cancer Chronic Hazards[2,4]		
Child Resident	*0.0076*~~0.006~~	*0.0057*~~0.0045~~
School Child	*0.0006*~~0.0005~~	*0.0005*~~0.00039~~
Adult Resident	*0.0023*~~0.0018~~	*0.0016*~~0.0013~~
Adult Worker	*0.035*~~0.031~~	*0.026*~~0.023~~

1 Values provided are changes in the number of cancer cases per million people exposed as compared to baseline conditions. Cancer estimates are rounded to two significant figures.
2 Note maximum concentrations for each scenario are not at the same location (grid point).
3 Includes exposure to TACs released from LAX from childhood (ages 0-6) through adulthood (ages 7-70).
4 Hazard indices are totals for all TACs that may affect the respiratory system. This hazard index is essentially equal to the total for all TACs.

Source: CDM, 2009.

Table 6-5

Direct Burial Alternative Annual Construction Emissions (Metric Tons CO_2)

Pollutant	**2009**	**2010**	**2011**	**2012**	**2013**	**Project Total**
Annual emissions, metric tons	254	~~2,633~~*3,824*	~~2,534~~*4,071*	1,839	2,200	~~9,460~~*12,188*

Source: CDM, 2009.

17. The conclusions in Section 6.4.3.2 of the Draft EIR regarding the Direct Burial Alternative's project-level construction impacts on Global Climate Change (GCC) contain a typographical error. The Draft EIR states that the project-level construction impact on global climate change would be less than significant. However, the 9,460 metric tons of construction-related carbon dioxide equivalent (CO_2e) emissions associated with construction of the Direct Burial Alternative would represent a substantial increase in greenhouse gas (GHG) emissions compared to current emission levels and would constitute a significant impact. In addition to this typographical error, a correction is provided in Table

6-5 above, as well as in the text below, that shows GHG emissions associated with the alternative increasing from 9,460 metric tons to 12,188 metric tons, due to a change in the alternative to accommodate additional utility lines, as described above under Corrections 2 through 4.

Greenhouse gas emissions are generally analyzed as a cumulative impact under CEQA and the conclusion that the Direct Burial Alternative would have a significant and unavoidable cumulative impact remains unchanged. LAWA took a conservative approach in the Draft EIR by including an evaluation of project-level construction-related impacts on GCC for purposes of information and comparison. For the CUP-RP, the Utilidor and the Direct Burial Alternative, all feasible mitigation measures would be implemented (Section 4.4.8), and, although the construction-related GHG emissions under the Direct Burial Alternative are considered a significant unavoidable impact, emissions are notably reduced under the Direct Burial Alternative compared to the construction-related GHG emissions associated with the CUP-RP with the Utilidor.

In light of the above, the first paragraph on page 6-14 of the Draft EIR is hereby revised as follows:

> The approximately ~~9500~~ *12,188* metric tons of construction-related GHG emissions under the Direct Burial Alternative would incrementally increase GHG emissions compared to baseline emission levels. GHG emissions would be incrementally less than under the proposed project, which would produce a total of 15,186 metric tons of construction emissions, ~~therefore~~ *nonetheless,* the impact on global climate change, with respect to project construction GHG, would ~~be less than~~ *remain* significant. The Direct Burial Alternative would generate the same operational emissions as the proposed project and would, therefore also have a less than significant impact on global climate change. Although it would reduce GHG emissions by 6 percent during operation, the Direct Burial Alternative would not meet the goal of the LAX Sustainability Plan to reduce emissions by 35 percent. Therefore, as with the proposed project, the Direct Burial Alternative would have significant and unavoidable cumulative impacts with respect to global climate change.

18. The second paragraph under the heading Relationship of the Direct Burial Alternative to the Project Objectives on page 6-14 of the Draft EIR is hereby revised as follows:

> As with the proposed project, the Direct Burial Alternative would have significant and unavoidable air quality, ~~and~~ human health risk*, and global climate change* impacts during construction and, similar to the proposed project, the Direct Burial Alternative's contribution to global climate change impacts during construction and operation would be cumulatively considerable and considered a cumulatively significant impact.

19. The third paragraph under Section 6.4.3.3 Environmentally Superior Alternative on page 6-14 of the Draft EIR is hereby revised as follows:

> In accordance with the CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, the Direct Burial Alternative is considered the Environmentally Superior Alternative. The Direct Burial Alternative would result in ~~51~~ *26* percent fewer construction peak hour trips than under the proposed project (~~72~~ *108* peak hour trips with the Direct Burial Alternative versus 146 peak hour trips with the Utilidor). The Direct Burial Alternative would also require less excavation for the CUP-RP's western utility corridor component (approximately ~~23,500~~ *44,650* cy compared to approximately ~~143,500~~*157,850* cy). The Direct Burial Alternative would reduce the project's significant VOC emissions impact and PM10 concentrations impact to a less than significant level, eliminating these significant and unavoidable impacts of the proposed project. Although this alternative would incrementally reduce the project's significant and unavoidable NOx emissions, this impact would not be reduced to a less than significant level. Annual emissions, from which cancer and chronic non-cancer health risks are assessed, would be ~~23~~ *15* percent to ~~99~~ *84* percent less than those under

the proposed project. Although emissions would be incrementally less compared to the proposed project, the health risk impact on workers would remain above the threshold of significance of 10 in one million. GHG emissions associated with construction activities would be ~~37.7~~*20* percent less under the Direct Burial Alternative than under the proposed project. However, the impact with respect to *project-level and* cumulative construction- and operation-related GHG would remain significant and unavoidable.

Appendix C- Air Quality Analysis and Human Health Risk Technical Report

1. Table 3-6A on page 3-6 of Appendix C of the Draft EIR under Section 3.1.4 Direct Burial Alternative has been revised as follows:

Table 3-6A

Direct Burial Alternative:
Maximum Mitigated Peak CUP-RP Daily and Annual Construction Emissions

Pollutant	Project Max	SCAQMD Significance Threshold	Emissions Exceed Threshold?			
Maximum Daily Emissions, Controlled (lb/day)[1]						
Carbon monoxide, CO	*237* ~~208~~	550	No			
Volatile organic compounds, VOC	*62* ~~55~~	75	No			
Nitrogen oxides, NO_x	*412* ~~363~~	100	Yes			
Sulfur dioxide, SO_2	0	150	No			
Respirable particulate matter, PM10	*54* ~~47~~	150	No			
Fine particulate matter, PM2.5	*25* ~~22~~	55	No			
Total Emissions (tons)	**2009 Total**	**2010 Total**	**2011 Total**	**2012 Total**	**2013 Total**	**Project Total**
Carbon monoxide, CO	1.51	*22.02* ~~15.14~~	*23.29* ~~16.41~~	10.95	12.62	*70.38* ~~56.62~~
Volatile organic compounds, VOC	0.30	*5.10* ~~3.64~~	*5.12* ~~3.66~~	2.03	2.36	*14.91* ~~11.99~~
Nitrogen oxides, NO_x	1.83	*32.05* ~~23.03~~	*33.37* ~~24.35~~	11.49	13.53	*92.27* ~~74.23~~
Sulfur dioxide, SO_2	0.00	*0.04* ~~0.03~~	*0.04* ~~0.03~~	0.02	0.03	*0.14* ~~0.11~~
Respirable particulate matter, PM10	0.20	*3.73* ~~2.49~~	*5.52* ~~4.27~~	1.36	1.95	*12.75* ~~10.26~~
Fine particulate matter, PM2.5	0.10	*1.96* ~~1.31~~	*3.08* ~~2.43~~	0.66	0.84	*6.64* ~~5.34~~

[1] "Controlled" includes emission reduction measures required by regulation (e.g., SCAQMD Rule 403), or the LAX Master Plan Community Benefits Agreement (construction equipment diesel particulate filters). These reductions are part of the project design.

Source: CDM, 2009.

2. The second sentence in the second paragraph on page 3-6 of Appendix C of the Draft EIR has been revised as follows:

The maximum peak daily emissions for the direct burial alternative are on average ~~56~~*50*% lower than the CUP-RP, and total project emissions are on average ~~34~~*18*% lower than the CUP-RP.

3. Table 3-6B on page 3-7 of Appendix C of the Draft EIR has been revised as follows:

Table 3-6B

Comparison of Emission Rates from CUP-RP and EIR Alternative

Pollutants Associated with Health Risk	Off-road Diesel	On-road Diesel	Construction Dust	Road Dust
Chronic PM10	*-18%~~-34%~~*	*-15%~~-23%~~*	*-84%~~-99%~~*	*-15%~~-23%~~*
Acute PM10	*-58%~~-63%~~*	*-15%~~-23%~~*	*-55%~~-71%~~*	*-15%~~-23%~~*
Chronic VOC	*-14%~~-30%~~*	*-15%~~-22%~~*	NA	NA
Acute VOC	*-56%~~-62%~~*	*-15%~~-22%~~*	NA	NA
Criteria Pollutants				
All pollutant average *for peak day*	*-54%~~-62%~~*	*-15%~~-23%~~*	*-55%[2]~~-81%1~~*	*-15%[2]~~-23%~~[2]*

[1] Negative values indicate that the direct burial alternative would generate less emissions than the proposed CUP-RP.
[2] PM10 and PM2.5 only

Source: CDM, 2009.

4. Table 4-2B of Appendix C of the Draft EIR has been revised as follows:

Table 4-2B

Air Pollutant Concentrations for Peak Year of Direct Burial Alternative Construction

Pollutant Concentration	Averaging Period	CAAQS/NAAQS	Project and Background	Exceed AAQS?
NO_2 (µg/m^3)	Annual	57/100	*36~~33~~*	No
	1-hr	339/NA	*265~~239~~*	No
		SCAQMD Significance Threshold	**Project**	**Exceed Threshold?**
PM10 (µg/m^3)	Annual	1.0	*0.90~~.5~~*	No
PM10 (µg/m^3)	24-hr	10.4	*7.7~~5.3~~*	No

Sources: CDM, 2009.

5. The second and third sentence in the second paragraph on page 5-20 of Appendix C of the Draft EIR, under section 5.2.3 Direct Burial Alternative has been revised as follows:

   Estimated cancer risk for adult residents and child residents for the CUP-RP alternative construction with mitigation were 1.*6* in one million and ~~0.4~~ *0.5* in one million, respectively. Estimated cancer risks from construction sources for a young child through adulthood (adult + child) at the modeled location with maximum construction cancer risks was 2.*0* in one million.

6. The first sentence in the third paragraph on page 5-20 of Appendix C of the Draft EIR, under section 5.2.3 Direct Burial Alternative has been revised as follows:

   Cancer risks for adult workers under the direct-burial alternative scenario are estimated to be ~~13~~ *14* in one million for construction impacts, which is above the threshold of significance of 10 in one million.

7. The third sentence in the fourth paragraph on page 5-21 of Appendix C of the Draft EIR, under section 5.2.3 Direct Burial Alternative has been revised as follows:

   Hazard indices for the migrated alternative for child residents, school children, adult residents and workers are *0.006, 0.0005, 0.002 and 0.03*~~0.005, 0.0004, 0.001 and 0.02~~, respectively.

8. Table 5-7 on page 5-21 of Appendix C of the Draft EIR has been revised as follows:

Table 5-7

Cancer Risks and Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals for CUP-RP Direct Burial Alternative

	Construction	
Receptor Type	**Unmitigated**	**Mitigated**
Cancer Risks[1,2] (per million people)		
Child Resident	*0.54*~~0.43~~	*0.51*~~0.4~~
School Child	*0.047*~~0.037~~	*0.044*~~0.035~~
Adult + Child Resident[3]	*2.1*~~1.7~~	*2.0*~~1.6~~
Adult Resident	*1.8*~~1.4~~	*1.6*~~1.3~~
Adult Worker	*15.5*~~14~~	*14.4*~~13~~
Non-Cancer Chronic Hazards[2,4]		
Child Resident	*0.0076*~~0.006~~	*0.0057*~~0.0045~~
School Child	*0.0006*~~0.0005~~	*0.0005*~~0.00039~~
Adult Resident	*0.0023*~~0.0018~~	*0.0016*~~0.0013~~
Adult Worker	*0.035*~~0.031~~	*0.026*~~0.023~~

[1] Values provided are changes in the number of cancer cases per million people exposed as compared to baseline conditions. Cancer estimates are rounded to two significant figures.
[2] Note maximum concentrations for each scenario are not at the same location (grid point).
[3] Includes exposure to TACs released from LAX from childhood (ages 0-6) through adulthood (ages 7-70).
[4] Hazard indices are totals for all TACs that may affect the respiratory system. This hazard index is essentially equal to the total for all TACs.

Source: CDM, 2009.

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Attachment 1

Original Comment Letters on the Central Utility Plant Replacement Project Draft EIR

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

September 15, 2009

Lisa Dugas
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Subject: Los Angeles International Airport (LAX) Central Utility Plant (CUP) Replacement Project
SCH#: 2009041043

Dear Lisa Dugas:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on September 14, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

CUP-AS00001

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2009041043
Project Title Los Angeles International Airport (LAX) Central Utility Plant (CUP) Replacement Project
Lead Agency Los Angeles World Airports

Type EIR Draft EIR

Description The proposed project provides for the replacement of the existing Central Utility Plant (CUP) and cogeneration facilities at LAX. The existing CUP provides heating and cooling for the terminals within the Central Terminal Area and generates electricity that is sold back to the Los Angeles Department of Water and Power (LADWP). The CUP-RP consists of the following components: replacement of the existing CUP and maintenance shop building, including replacement of the boilers and electrical co-generation equipment; replacement of existing cooling tower system; construction of an underground thermal energy storage tank at the site of the existing CUP; electrical upgrades to include a new electrical substation and a retrofit of the existing LADWP substation; installation of a new fire management system and a new fire life safety system; and replacement of the direct buried chilled water and hot water service lines in the CTA. The project includes the demolition of the existing CUP and associated ancillary facilities. In addition, the project includes the potential installation of an off-site recycled/reclaimed treatment system and water pipeline, and the possible use of blogs from digesters at the Hyperion Treatment Plan to augment the existing natural gas system at the CUP.

Lead Agency Contact

Name Lisa Dugas
Agency Los Angeles World Airports
Phone 310-648-3853 x 1053 **Fax**
email
Address 7301 World Way West, 3rd Floor
City Los Angeles **State** CA **Zip** 90045

Project Location

County Los Angeles
City Los Angeles, City of
Region
Cross Streets West Way/Center Way
Lat / Long 33° 56' var" N / 118° 23,24' var" W
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-105, I-405
Airports LAX
Railways
Waterways Pacific Ocean
Schools Visitation ES
Land Use Z: LAX-L Zone M2: Airport Airside Sub-area, LAX-A Zone C2: Airport Landside Subarea

Project Issues Air Quality; Traffic/Circulation; Other Issues

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Caltrans, Division of Aeronautics; Caltrans, District 7; Air Resources Board, Airport Projects; Air Resources Board, Major Industrial Projects; Integrated Waste Management Board; Regional Water Quality Control Board, Region 4; California Energy Commission; Native American Heritage Commission; Santa Monica Bay Restoration

Date Received 07/30/2009 **Start of Review** 07/30/2009 **End of Review** 09/14/2009

CUP-AS00001

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

LAXCUP

From: Jillian Baker [jbaker@aqmd.gov] **Sent:** Thu 9/3/2009 4:02 PM
To: LAXCUP
Cc: Tom Chico; Steve Smith; Daniel Garcia
Subject: Request for Additional Information for AQ Analysis for LAX Central Utility Plant Replacement Project DEIR
Attachments:

Hi Lisa,

This email is a follow-up to a couple of voicemails I left you regarding additional files that are necessary for AQMD's review of the Air Quality Dispersion Modeling and HRA prepared for the LAX Central Utility Plant Replacement Project DEIR. Please provide electronic copies of the following files:

AERMOD input and output files

DEM files used in AERMOD

Meteorological data used in AERMOD

BPIP input and output files

HARP input and output files

Emission files used in HARP for calculating the health risk

A README file which describes each electronic file provided

Thanks,

Jillian Baker, Ph.D.

South Coast AQMD

21865 Copley Drive,

Diamond Bar, CA 91765

Direct: 909.396.3176

CUP-AR00001

South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: September 18, 2009 September 18, 2009

Ms. Lisa Dugas
Los Angeles World Airports
Environmental Services Division
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Los Angeles International Airport (LAX) Central Utility Plant Replacement Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff appreciates the fact that the lead agency allowed additional time in which to submit comments. Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SS:EE:DG

LAC090730-01
Control Number

CUP-AR00002

Construction and Operational Air Quality Analysis

1. In Section 4.2.6 (Impact Analysis) of the Air Quality Analysis for the Draft EIR the lead agency assesses the localized air quality impacts from the proposed construction activities. The lead agency summarizes the maximum daily construction emissions from the project's proposed recycled/reclaimed water treatment facility in Table 4.2-14 on page 4-80. On page 4-79 the lead agency states that the closest alternative location for the recycled/reclaimed water treatment facility to a sensitive receptor is Site 3, however, the lead agency does not clearly delineate the desired location for the facility or the alternative location(s) and its distance from the central terminal area. As a result, SCAQMD staff cannot determine the potential peak daily emission impacts from the project.

   SCAQMD staff recommends that the lead agency clearly delineate the potential sites for the recycled/reclaimed water treatment facility in Figure 4.2-1 and 4.2-3 and demonstrate that the distance between the central terminal area and the two potential recycled/reclaimed water treatment facility sites does not create shared impacts among any sensitive receptors during project construction. Once the lead agency has revised Figure 4.2-1 and 4.2-3 the SCAQMD staff requests that the lead agency revise Table 4.2-14 (Emissions From Recycled/Reclaimed Water Treatment Facility and Pipeline Construction) of the Construction Air Quality Analysis in the Final EIR quantifying peak daily air quality impacts and summarizing all emissions from the planned construction activities including NOx, SOx, CO, PM10, PM 2.5 and VOC.

2. On page 4-59 of the Draft EIR the lead agency states that the ammonia emissions were calculated using the turbine exhaust gas flow rate and assumed concentration of ammonia in the exhaust gas. The lead agency assumed concentrations of 5 parts per million by volume (ppmv) based on the notion that this is the limit for ammonia slip from selective catalytic reduction (SCR) units typically imposed by SCAQMD. However, the current SCAQMD's current best available control technology (BACT) requirements for a major source facility limit ammonia slip from SCR units to 2.5 ppmv. SCAQMD staff requests that the lead agency revise the ammonia emissions calculations to reflect the current SCAQMD BACT requirements for a major source facility.

Health Risk Assessment

3. The health risk assessment conducted by the lead agency considered risks based on the inhalation pathway and did not include a multi-pathway analysis, as recommended by the SCAQMD. As a result the health risk impacts concluded by the lead agency were under-estimated. For example, using the maximally exposed worker receptor, the existing cancer risks are 0.46 per million which will increase to 0.53 per million with the project. Thus, the incremental cancer risk increase is 0.07 per million which is higher than the 0.004 per million reported in the DEIR. The

SCAQMD staff requests that the lead agency revise the health risk assessment using the guidance found at the following web addresses:

http://www.aqmd.gov/prdas/ab2588/pdf/AB2588_Guidelines.pdf

http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html

http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html

Regional and Localized Construction and Operational Mitigation

4. In addition to the air quality mitigation measures proposed in Table 4.2-10 on page 4-76 and 4-77 of the Draft EIR the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

   NOx:

   - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
   - Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
   - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
   - Require the use of alternative fueled off-road construction equipment,
   - Restrict operation to "clean" trucks, such as a 2007 or newer model year,
   - Develop park and ride programs,
   - Improve traffic flow by signal synchronization, and
   - Require construction parking to be configured such that traffic interference is minimized.

   Fugitive Dust:

   - Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
   - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation, and
   - When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks.

   VOC

   - Construct or build with materials that do not require painting, and
   - Require the use of pre-painted construction materials.

Additional construction and operational mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

In addition to the above NOx measures, SCAQMD staff recommends modifying the following existing mitigation measures included in Table 4.2-10 as follows.

- Prohibit construction vehicle and engine idling in excess of ~~ten~~ five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
- Specify ~~combination of~~ conditions for electricity service from power poles ~~and portable diesel or gasoline fueled generators using "clean burning diesel" fuel and exhaust emission controls~~ for electrification of service equipment and auxiliary power units at the facility,
- Reroute construction trucks vehicles away from congested streets and prohibit staging and parking of construction vehicles (including workers' vehicles) on streets adjacent to all sensitive receptors such as schools, day care centers and hospitals.

ARSAC Alliance for a Regional Solution to Airport Congestion
322 Culver Blvd., #231 Playa del Rey, CA 90293
310 641-4199 info@regionalsolution.org

September 14, 2009

Los Angeles World Airports
Environmental Services Division
Attention: Lisa Dugas
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

(also via e-mail to LAXCentralUtilitiesPlant@lawa.org)

Re: LOS ANGELES CITY FILE NO. EIR-09021-AD, DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CENTRAL UTILITY PLANT REPLACEMENT PROJECT, AT LOS ANGELES INTERNATIONAL AIRPORT (LAX)

Dear Ms. Dugas:

ARSAC is pleased that LAWA has identified the need for improvements and upgrades to the Central Utilities Plant that was built in the 1960s and modified in the 1980s. Since the physical location is within the Central Terminal Area we expect limited long term impacts on the surrounding communities and trust that the construction scheduling and routing will minimize impacts as well. We agree with LAWA that the project option ultimately chosen should be that which emphasizes sustainability, reliability and maintainability since these costs, in the long run, will far exceed the initial construction cost.

We are pleased to see that LAWA stated in the EIR introduction that, "Staging for construction equipment, as well as construction worker parking, would be located in surface parking lots within the CTA." We understand that LAWA has discarded plans for any use of parking accesses along the northern boundary, Westchester Parkway, including areas behind the existing Westchester Business District. If our understanding has changed, please note our unequivocal objections and ask that you specify what your new plans are before project approval.

Several questions arise as to the scope of the project:

- How close will the new CTA building site be located to the FAA Control Tower? What were the results of the safety and security assessment since the current site is in close proximity to the tower.
- The EIR lists several utility service upgrades based on current and already approved structure needs. Does this mean that electrical, water, and heating/cooling service will be adequate to enclose the entire CTA area as depicted in the approved Alternative D Master Plan currently occupied by CTA parking lots? What extra allocation of utility needs are projected to accommodate new technologies (i.e. in the 1980s there was little though about the computer access capacity?).
- What redundancy has been built into the designs? Can power to one terminal or building impact other facilities? If water is suspended to one building will others be impacted? If grey water is to be used (and we encourage it for permitted uses), will separate routing to buildings be enacted or will the pipes be in series risking multiple locations? Is the fire hydrant system separate from other water sources? Can grey water be used for fire suppression?

- Assuming utilidors are chosen as the preferred implementation option, will they be enacted for use to all facilities supplied instead of the limited number shown in EIR drawings?
- How might the use of water treatment site one impede future LAX expansion east? In what way would water treatment site two at Jenny/96th street impact the potential rights of way for light rail? If the purpose of the water treatment is to render water from the West Basin District usable for replenishment of cooling systems, can treated water be brought directly from the El Segundo site to LAX instead of a separate treatment plant?
- Since the existing pipes are of an age when asbestos was used what special provisions for handling have been established?

Other questions include:

- What separation of the air duct system is possible? If a contaminant is introduced in one area what measures are possible to be implemented to limit exposures?
- The Monitoring/Mitigation Plan states in MM-AQ-2 that areas will be paved to reduce fugitive dust "prior to final occupancy..." What will be done during construction to reduce this? Given that most of the LAX landside and airsides have been subjected to significant amounts of toxic substances, what controls will be in place to monitor toxicity of the dust? Similarly, since the areas under construction will be over one or more of the major sewer lines built before 1930 that crosses LAX to Hyperion, what effluent controls and monitoring will be in place?
- Chapter Six talks about air quality issues and emphasizes monitoring PM10 and PM2.5 sized particles. LAWA has been the site of air quality studies showing that smaller, ultra-fine (PM0.1) particles do not always correlate with the larger ones. What monitoring or accommodation will be done for these smaller particles?
- In the early 2000's LAX was the site of a fuel cell electricity generating experiment. Was it in the area of the new CUP and is it a viable supplement?
- What alternative power sources have been considered to support the CUP? What solar power generation has been considered and where? Has alternative power sources been planned in case of a failure of a power substation?

Sincerely,

Denny Schneider, President

Los Angeles World Airports
Environmental Services Division
Attention: Lisa Dugas
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

ARSAC
322 Culver Blvd. #231
Playa del Rey, CA 90293

LAX EXPANSION NO

CUP-PC00001

Los Angeles International Airport Area Advisory Committee

Committee Members: Residents of El Segundo, Inglewood, Lennox, Hawthorne, Culver City, Marina del Rey and Westchester/Playa del Rey

'09 SEP 14 AM 8:46

CS

September 11, 2009

Ms. Lisa Dugas
LAWA Airport and Facilities Planning
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

Re: LAX Central Utility Replacement Project/City File No. EIR-09021-AD

Dear Ms. Dugas:

The members of the LAX Area Advisory Committee (LAXAAC) favor the construction of the proposed Central Utility Plant replacement project (CUP-RP), as we believe it is important for LAWA to update the electrical system and heating and cooling facilities at LAX.

As airport neighbors, we are encouraged by the expected improvements to environmental quality projected once the new plant is operational. Nonetheless, we are concerned about the insufficient plans to mitigate the environmental impacts from the CUP construction. Although the Draft EIR proposes to require construction measures to mitigate air pollution, noise, dust, hours of operation, construction workers' parking and transportation, and disturbance for neighboring communities, the Draft EIR explicitly recognizes that these measures will be inadequate. Moreover, the measures are stated as generalities and the methods and procedures designed to ensure compliance with these directives are not clear.

We are particularly concerned the construction project would create significant air pollution for residents of communities near the airport, and would not be adequately mitigated by the proposed mitigation measures. The levels of PM_{10} are indicated as "significant" during the construction process (see page 4-84) and the significant levels of these pollutants as well as others (volatile organic compounds and nitrogen oxides) are "unavoidable" during construction (page 1-9). Given these findings, we believe that additional mitigation measures must be incorporated during construction, so that the project-related cancer risks are diminished. Otherwise, you are simply trading increased cancer levels in the surrounding communities for energy efficiency at the airport. Despite our belief in the goal of energy efficiency, we are not willing to accept that trade.

In addition, the Draft EIR does not adequately account for all of the potential health effects of such pollution. For example, the high incidence of asthma in communities adjacent to the airport is not discussed in the Draft EIR. Current air pollution studies have shown that particles smaller than $PM_{2.5}$ can cause serious lung damage and that particulate matter larger than the PM_{10} level can settle in the bronchial tubes and lungs and cause health problems. We also are concerned that the project's effects on air pollution are not examined thoroughly enough, particularly because the Draft EIR did not address particulate matter smaller than the $PM_{2.5}$ level. Inasmuch as technology is now available to look at this smaller particulate matter, we believe LAX should do so.

Another concern of Westchester and Playa del Rey residents is the proposed construction parking and staging area on Westchester Parkway. Such a staging area originally was proposed in the Draft EIR for the modernization of the Tom Bradley International Terminal, although we have been promised that it will be removed from that project. Having it included in the proposal here suggests that it has taken on a life of its own. Similarly, there is a second staging area for large equipment planned for the area between the Ralphs/CVS shopping center on Sepulveda and the fire station at Emerson, just off Westchester Parkway. As this is close to residences, our concern is that the equipment would exacerbate both air pollution and noise unbearably for those residences during the construction process. Please ensure that all construction staging and parking occurs on Pershing, further away from residential areas.

In addition to the antiquated and polluting equipment used in the current utility plant, one of its worst features is that there is no backup in the event the plant fails as a result of any natural or man-made disaster. The CUP-RPI must provide for sufficient redundancies to allow continued power in such event. We do not see this discussed in the Draft EIR.

We also are concerned that the maps and diagrams in the Draft EIR show utilidors to carry electricity, water and sewer lines, but do not show them connecting with all the terminals. We assume that such connections will take place, but the lack of discussion in this document suggests that the environmental impacts of their construction are not being considered.

Our Committee members believe that the Draft EIR must address these issues. Thank you for your consideration of our comments. To contact the Committee Chair, please call the group's facilitator at (310) 646-5742 x7109 in the Community Relations Office. See attached mission statement.

Sincerely,

John Dragone, Chair
LAX Area Advisory Committee
c/o LAX Community Relations
#1 World Way / P.O. Box 92216
Los Angeles, California 90009-2216

cc: Mayor Antonio Villaraigosa
Councilman Bill Rosendahl
Los Angeles Board of Airport Commissioners
LAWA Executive Director Gina Marie Lindsey
LAWA Deputy Executive Director Roger Johnson

CUP-PC00002

Los Angeles International Airport Area Advisory Committee

Committee Members: Residents of El Segundo, Inglewood, Lennox, Hawthorne, Culver City, Marina del Rey and Westchester/Playa del Rey

Mission Statement

The Los Angeles International Airport Area Advisory Committee (LAXAAC) has been in existence for more than 30 years as an advisory board to the Board of Airport Commissioners (BOAC).

Members of the committee are appointed by the appropriate legal authority in communities immediately surrounding LAX:

El Segundo,
Lennox,
Hawthorne,
Inglewood,
Culver City,
Marina del Rey,
and the Westchester and Playa del Rey areas of Los Angeles.

The members of LAXAAC have one overriding concern about LAX: **safety.** This concern includes safety for those who work or live near LAX in addition to air passengers, crews, and aircraft.

Other concerns for committee members are air and noise pollution and surface traffic in and around their communities.

The members of LAXAAC will continue to participate in LAX issue discussions and proposals and look forward to on-going interaction with the members of the BOAC and LAWA staff.

06/09

LAXCUP

From: BISCHOFF, DAVID **Sent:** Mon 9/14/2009 4:00 PM
To: LAXCUP
Cc: Denny@WeLiveFree.com; DUGAS, LISA; Jim Bickhart; JOHNSON, ROBERT I.; councilman.rosendahl@lacity.org; councilmember.hahn@lacity.org; LA Times
Subject: Additional comments-EIR Report-8/18/09 Meeting-"FOR THE NEXT 50 YEARS"
Attachments:

The fact that the Central Utility Plant (CUP) at LAX is finally being brought up to current day standards and capabilities is absolutely wonderful. Truthfully, no modernization of the Airport can be legitimately accomplished without also addressing the CUP. However, there also are four other areas of consideration that need to be remembered, addressed, and evaluated as the "whole" plan becomes real. The four are:

1) Life Expectancy. The current CUP has lasted and has been functioning for over fifty (50) years. Yes, there have been some upgrades and modifications, but that building has been there maintaining its responsibility for 50 years. Is it wrong to assume that the new CUP, when built, will also be around for the next 50 years? That's around 2060 when the Citizens of Los Angeles will be entertaining these discussions again. Wouldn't it be wise to anticipate that between 2010 and 2060, that new inventions, systems, and needs will occur and come to light during that time frame? Wouldn't it then be wiser to make sure, to the best of our ability, that the new CUP be prepared and be capable of accepting and handling those new ideas and systems with as little difficultly as possible "DURING THE NEXT 50 YEARS".

2) Maintenance Costs. Speaking of 50 years, when we have something built, shouldn't we also ask ourselves, the builders, and the designers "how much money ($) is this going to cost us to maintain over it's life time as the result of building this thing as it's currently conceived"? Are there areas of design that need to be addressed to lower those long-term costs of the building? How about safety? Will the workers maintaining this thing ever be in un-due jeopardy?

3) Project Costs. How much is this going to cost me? I can't believe it! Is there any aspect of this project that can be accomplished in a less expensive way? There are other things I want to do with my money, so if there are any corners we can cut.....let's do it. As long as the thing works when we're finished, is all that's important. To scrimp here and there in the effort to be able to do more does not mean the project was handled correctly. Frequently, projects have to down shift to second gear so as to guarantee that in the end all was done right and correct.

4) Architects, Engineers, and Executive Management. Although they all have different responsibilities and activities for their careers, all three have one common/similar question in regards to a project, their financial reimbursement not with standing: How will this benefit me? Will this endeavor project me to a higher level in my next position? All three occupations, when government projects are involved, occur as the result of politicians trying to impress their electorate and therefore prove that they deserve to stay in office or even better, to move on up to a higher position. The same concept goes for these three positions: the more flash and flamboyance of their last project increases their opportunities for the next.

It has been estimated that the cost of properly installing the complete piping network for the new CUP with utilidors is $250,000,000. Yes, I agree that's a lot of money; however the return on investment (ROI) over a 50 year time frame could be incredible. Also, if the current desired plan of the direct burial approach is used the initial cost savings could be nominal and prevent LAX many opportunities, again OVER THE NEXT 50 YEARS.

The most apparent disadvantage with utilidors is the fact that they are NOT flashy, no one knows they're there. Politicians, Architects, Engineers, and Executive Management can not flaunt a project that they have been involved with unless it is really apparent and noticeable. Most folks have a short memory span and they have to be reminded again and again with eye catching images. The utilidors for LAX would house the High Temp water supply and return (used for area

heating and the creation of domestic hot water), the Chill Water supply and return (used for air conditioning), and a back-up supply and return matrix (that when put on-line, would allow for repairs and/or up-dates/modifications to either of the other two systems). Also the utilidors can be used for other Central Terminal Area (CTA) infrastructure systems. There is only one word that describes utilidors.....BORING.

Currently there are needs for a complete re-do of the Information Technology (IT) fiber optics system. The present fiber optics system is over-used and under-sized. The idea now in play is to install conduit along the CTA's upper roadway. Although this design would work it's NOT state-of-the-art and exposes the system to many possible hazards and interruptions. The utilidors WOULD give a state-of-the-art infrastructure solution to this critically important communication/business application system. The utilidor system always being available to expand and/or for modification assessability. The utilidors can also offer pathways for power line infrastructure, other telecommunication transmission lines and for other needs and inventions that will be coming along IN THE NEXT 50 YEARS.

The final offering that utilidors would provide and one that is never hoped for is to provide access and/or evacuation in the event of an emergency. In as much as each utilidor enters every CTA Terminal in the first floor Pump Room location, people in danger could evacuate and/or Police/Security forces could enter the Terminals if need be without being observed.

LAWA needs to do what is right and correct and not succumb to pressures that are personal. Fortunately, the Mid-Field Terminal project is on hold. That is alright. With the completion of the Bradley West Gate Project, LAX will be able to accommodate the new and next generation of aircraft and more than enough traveling public for the foreseeable future. But what we don't need to spend our money on are acres and acres of beautiful flashy ocean waves on top of the areas that are now Parking Structures 2B, 3, 4 and 5, or on the North and South Concourses of the Bradley. These waves are going to cost a fortune to maintain and what type of safety hazards will our maintenance personnel face in keeping this man-made ocean allusion attractive? Should the LAX Construction and Maintenance Division have to dig up parking lots, area planters or structures of any kind because there happens to be a leak in the High Temp water line because they were buried in the ground?

LAX should not forget the basics and the basics done correctly. Utilidors for our infrastructure, our North Runways moved to proper configuration and distances to accommodate the new gigantic, less polluting, less noise creating aircraft that will be flying IN AND OUT FOR THE NEXT 50 YEARS.

The responsibility that lies with us all now, is to guarantee that LAX will stay and be the Gateway of the Pacific FOR THE NEXT 50 YEARS.

LAXCUP

From: Danna Cope [dannacope@gmail.com] **Sent:** Mon 9/14/2009 4:47 PM
To: LAXCUP
Cc:
Subject: LAX Centra Utility Replacement Project
Attachments:

September 14, 2009

Ms. Lisa Dugas

Los Angeles World Airports

Airport and Facilities Planning

7301 World Way West, 3rd Floor

Los Angeles, CA 90045-5803

Re: LAX Central Utility Replacement Project
City File No. EIR-09021-AD

Dear Ms. Dugas:

The proposed Central Utility Plant replacement project (CUP-RP) must be completed to replace aged and the potentially dangerous electrical system and heating and cooling facilities at LAX. However, the plan presented to the community needs some modifications and clarifications, especially during the construction phases.

Mitigation measures must be included to correct the environmental impacts from the CUP construction. The Draft EIR proposals to require construction measures to mitigate air pollution, noise, dust, hours of operation, construction workers' parking and transportation, and disturbance for neighboring communities are inadequate, as the Draft EIR explicitly recognizes that these measures will impact the surrounding communities. The mitigation measures stated in the Draft EIR are merely generalities without necessary methods and procedures to ensure compliance.

Of particular concern is the significant air pollution that would be created for nearby communities which would not be adequately mitigated by the Draft EIR's proposed measures.

As one of the authors, I agree with the points made by the LAX Area Advisory Committee:

"The levels of PM_{10} are indicated as "significant" during the construction process (see page 4-84) and the significant levels of these pollutants as well as others (volatile organic compounds and nitrogen oxides) are "unavoidable" during construction (page 1-9). Given these findings, we believe that additional mitigation measures must be incorporated during construction, so that the project-related cancer risks are diminished. Otherwise, you are simply trading increased cancer levels in the surrounding communities for energy efficiency at the airport. Despite our belief in

the goal of energy efficiency, we are not willing to accept that trade.

"The Draft EIR also does not adequately account for all of the potential health effects of such pollution, e.g., the high incidence of asthma in communities adjacent to the airport. Current air pollution studies have shown that particles larger than PM_{10} can cause serious lung damage and that particulate matter smaller than the $PM_{2.5}$ level can settle in the bronchial tubes and lungs and cause health problems. We also are concerned that the project's effects on air pollution are not examined thoroughly enough, particularly because the Draft EIR did not address particulate matter smaller than the $PM_{2.5}$ level. Inasmuch as technology is now available to look at this smaller particulate matter, we believe LAX should do so.

"Another concern of Westchester and Playa del Rey residents is the proposed construction parking and staging area on Westchester Parkway. Such a staging area originally was proposed in the Draft EIR for the modernization of the Tom Bradley International Terminal, although we have been promised that it will be removed from that project. Having it included in the proposal here suggests that it has taken on a life of its own. Similarly, there is a second staging area for large equipment planned for the area between the Ralphs/CVS shopping center on Sepulveda and the fire station at Emerson, just off Westchester Parkway. As this is close to residences, our concern is that the equipment would exacerbate both air pollution and noise unbearably for those residences during the construction process. Please ensure that all construction staging and parking occurs on Pershing, further away from residential areas.

"In addition to the antiquated and polluting equipment used in the current utility plant, one of its worst features is that there is no backup in the event the plant fails as a result of any natural or man-made disaster. The CUP-RPI must provide for sufficient redundancies to allow continued power in such event. We do not see this discussed in the Draft EIR.

"We also are concerned that the maps and diagrams in the Draft EIR show utilidors to carry electricity, water and sewer lines, but do not show them connecting with all the terminals. We assume that such connections will take place, but the lack of discussion in this document suggests that the environmental impacts of their construction are not being considered."

Thank you for your consideration of my comments.

Sincerely,

Danna Cope

8219 Reading Ave.

Westchester, CA 90045

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Danna Cope
dannacope@gmail.com

LAXCUP

From: Cain, Gavin [GCain@ptoserve.com] **Sent:** Mon 8/24/2009 12:30 PM
To: LAXCUP; DUGAS, LISA
Cc:
Subject: CUP - DRAFT EIR Presentation Last Week @ Flightpath
Attachments:

Lisa, I attended the presentation last week at Flightpath and am under the impression the minutes, photographs/photoboards/diagrams, and Powerpoint presentation will be made available. Are they available for download via BAVN, or is there another way to obtain the documents, etc?

Thank You,

Gavin

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LAX Central Utility Plant Replacement Project Draft EIR Public Hearing
August 18, 2009

LISA DUGAS: Thank you guys. Okay, with that I think we will open the public comment period. We have three speaker cards tonight. So the first speaker that I have, and I want to say again that you have three minutes to make your comment or ask your question. So first speaker is David Bischoff, followed by Nan Schneider, followed by Nora MacLellan. Is it MacLellan? Okay, thank you. David, let me get the timer ready.

DAVID BISCHOFF: Wouldn't want to break the Brown Act, Right? Right.

(comments about time on clock)

UNIDENTIFIED SPEAKER: Since there's only three speakers, why bother?

DAVID BISCHOFF: Yeah, I won't be talking for 33 minutes. I could, but I won't. No. Anyway, good evening folks. My name is David. I work here at the airport, and I have since 1990. When I transferred over from Hyperion I was an apprentice pipe fitter, and my first two and a half years was spent at the CUP. I put in the brand new chill water unit with Stanley Mukagawa who was the senior pipe fitter at the time. I left the CUP and went to the plumbing shop in the construction maintenance for the next 15 some odd years where I was involved with a variety of things, frequently with the CUP. I worked swing shifts so I spent a lot of time in the CUP on the off-shifts.

First of all on the drawing over there on the Utilidor it doesn't mention terminal six. It doesn't go to terminal six it kind of like forgets it, I guess. Anyway, there's one thing about construction projects that seems to be forgotten, and that is maintenance of the projects after everybody leaves. After all the designers and everything make this beautiful thing with all the latest state-of-the-art, maintenance is forgotten. Yet, the bulk of the costs over the long term is maintenance costs. Now, in the 50s when they were building the old tower, the theme building and the CUP, they were, guess what? running out of money on the theme building because it was going to be so beautiful. So they took a lot of the dollars from the CUP project and they decided, you know what we're going to do? We were going to have Utilidors for the pipes. Instead let's just bury them in the ground and it'll be there where you won't have to worry about it ever again. Not. Not. Over time steel pipes break. Steel pipes leaks. There was a variety of problems. I don't know how many nights I spent in the CTA all night leaving at seven o'clock in the

morning repairing another leak. Okay. I am in favor of the Utilidors for a variety of reasons. First of all, maintenance costs are easier and over time so let's figure this project will be worth another fifty years of our life here and we all will probably have vanished from the planet by then. Over the next fifty years people can maintain the pipes, upgrade the systems and all the new technical widgets and exotic stuff that people will develop, and we're only on the brink of that, and the costs will be comparatively a lot less. So we need the Utilidors. The... and I also feel that not only should there by the high temps supply and return, the low temp or the chill water supply and return but also a spare supply and return so you have three piping systems in the Utilidors from the CUP to the terminals in however the configuration finally goes because that will give you the capabilities for the next five decades in which this project will be in use. Thank you.

LISA DUGAS: Thank you David. And right on time, too. Okay, number two speaker. Nan Schneider.

NAN SCHNEIDER: Hi, I'm Nan Schneider of ARSAC and I want to thank you first of all for doing the CUP project, it's been long overdue. Failures at the airport, you know, you can't have a modern airport without modern utilities. So we are grateful for that. I'm highly disappointed to see that we have put staging areas again on the border of Westchester. I don't understand why you don't use the same staging areas that you're going to be using for the Bradley. I…, but again I think this is a wonderful project. The only thing I would suggest is that you put the rest of the Utilidors for the terminals that are not added to this because it's just going to cost more later. That's it.

LISA DUGAS: Thank you Nan. Nora MacLellan

NORA MACLELLAN: Hi.

LISA DUGAS: Let me get you reset here.

NORA MACLELLAN: I know. I'm rather verbose. Can I start now?

LISA DUGAS: Yes you can, thank you.

NORA MACLELLAN: My name is Nora MacLellan. I'm a resident of Playa del Rey. I'm a, I'm a board member of the neighborhood council of Westchester/Playa, past secretary of ARSAC. I think that the, the central utility plant— brilliant- needs to be done. I love the suggestions of the previous gentleman to have some backup systems in place is excellent and I look forward to this project commencing. It's long overdue. However, after reviewing these boards, I notice there's been additions to the boards since the

TBIT. An agreed to employee parking in staging areas on Westchester parkway are still there. There's…, the agreed to… and those parking areas were to be removed. The agreed to new parking area staging area on Pershing is in place, which is fabulous, and then there's a brand new construction staging area just east of the fire station off of Westchester Parkway in Westchester right behind Sepulveda. This is not going to work. You have, these are residential communities, we cannot handle the traffic, we cannot handle the noise, we cannot handle the additional pollution and this is not what we are going to stand for, nor have we agreed to. Thank you.

LISA DUGAS: Thank you, Nora. Any more speakers? I think that's it. Three speaker cards. If nobody else has any more comments I'm going to close the public comment period. Okay, that's going to end the public comment period. Thank you very much for coming…