

Final Environmental Impact Report (Final EIR)

[State Clearinghouse No. 2014051040]

for

Los Angeles International Airport (LAX) Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements 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 Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project and supplements the Draft EIR for the Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project (consisting of Volumes 1 and 2), previously circulated for public review and comment. The Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project EIR is available for review at Los Angeles World Airports (LAWA) Administrative Offices, One World Way, Suite 218, Los Angeles, California 90045.

**City of Los Angeles
Los Angeles World Airports**

June 2014



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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 Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project (Project) at Los Angeles International Airport (LAX). As further described in the Introduction of this document, the proposed Project includes: implementation of declared distances on Runway 6L and 6R; pavement rehabilitation of Runway 6L-24R and Taxiway AA; demolition and relocation of service roads; covering a portion of the Argo Ditch; relocating security gate(s) and the Air Operations Area (AOA) fence; closure of equipment parking areas; and realignment of taxiway hold bars.

In accordance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA), as Lead Agency, completed an EIR to address and disclose the potential environmental impacts associated with the proposed Project. LAWA circulated a Draft EIR regarding the Project, received public and agency comments on the Draft EIR, and prepared written responses to those comments – all of which provides the basis for this Final EIR.

Pursuant to CEQA Guidelines §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 proposed Project consists of two components, as follows:

Component 1: Draft EIR and Technical Appendices

Volume 1 – Draft EIR: Volume 1 of the Final EIR includes the Draft EIR-Main Document, Chapters 1 through 7, which was distributed for public review and comment from May 8, 2014 through June 9, 2014. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were provided the opportunity to comment through June 23, 2014.

Volume 2 – Draft EIR Technical Appendices: Volume 2 of the Final EIR includes Appendix A and technical Appendices B through G. Appendix A compiles input received associated with the Notice of Preparation (NOP) that was distributed for public review and comment from August 22, 2013 through September 23, 2013, including: Initial Study, Notice of Preparation (NOP), NOP Comments, Scoping Meeting Materials, and Scoping Meeting Comments. Appendices B through G contain the supporting data and analyses that were developed in conjunction with the Draft EIR for Air Quality and Greenhouse Gases, Biological Assessment, Jurisdictional Delineation, Human Health Risk Assessment, Noise, and Construction Traffic, respectively.

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

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

The second part of the Final EIR consists of a compilation of the comments received on the Draft EIR, and the written responses prepared by LAWA 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 have been added by LAWA as part of the Final EIR.

All of the documents described above, comprising the Final EIR for the proposed Project, are available for public review at:

- LAWA Administration Offices, One World Way, Suite 218, Los Angeles, CA 90045
- Westchester-Loyola Villa Branch Library, 7114 West Manchester Avenue, Los Angeles, CA 90045
- Playa Vista Branch Library, 6400 Playa Vista Dr., Los Angeles, CA 90094
- Inglewood Library, 101 West Manchester Boulevard, Inglewood, CA 90301
- El Segundo Library, 111 W. Mariposa Ave., El Segundo, CA 90245

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

1.0 INTRODUCTION AND INDICES

1.1 Introduction

In compliance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA) has completed this Final Environmental Impact Report (Final EIR) for the Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project (Project) at Los Angeles International Airport (LAX). As described in the preface of this document, the Final EIR for the proposed Project consists of two components, with the first component consisting of Volumes 1 and 2 – Draft EIR and associated Technical Appendices, and the second component being Volume 3 – Responses to Comments and Corrections and Additions to the Draft EIR. This document, Volume 3, constitutes the second component of the Final EIR.

Draft EIR

A detailed description of the proposed Project is provided in Volume 1 of the EIR (see Chapter 2 in the Draft EIR-Main Document). On May 8, 2014, LAWA published a Draft EIR for the proposed Project. In accordance with CEQA, the Draft EIR was circulated for public review for 30 days, with the review period closing on June 9, 2014. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were provided the opportunity to comment through June 23, 2014. A public workshop was held on May 22, 2014, during the comment period.

As explained in more detail in Volume 1 of the EIR, the proposed Project includes: covering of portions of the Argo Ditch, the relocation of a portion of a service road along Lincoln Boulevard, closure of a portion of a service road located within the Runway 6L-24R RSA south of the runway, relocation of a portion of a service road located within the Runway 6R-24L RSA north of the runway, and closure of parking areas located within the Runway 6R-24L RSA. The proposed Project would also implement declared distances on Runway 24R and Runway 6R. Specific components of the proposed Project related to Runway 6L-24R and Runway 6R-24L RSA improvements include:

- Implementation of declared distances on Runway 6L and Runway 6R
- Demolition of service road segments on the west end of Runway 6L
- Service roads in the eastern portion of the Runway 6L-24R RSA would be relocated outside the RSA
- Two segments of service roads would be constructed for access to navigational aids (navaids) east of the runways
- Service road segments would be constructed between the Runway 6L-24R RSA and the Runway 6R-24L RSA
- Cover a segment of the Argo Ditch
- Pavement rehabilitation of Runway 6L-24R and Taxiway AA
 - Runway centerline and touchdown lighting replacement
 - Runway pavement markings
- Closure of vehicle service roads located within the Runway 6R-24L RSA

1. Introduction and Indices

- Relocate security gate(s)
- Relocate Air Operations Area (AOA) Fence
- LAWA equipment parking areas closures
- Realignment of taxiway hold bars
- Construction Staging Areas

Final EIR

In accordance with CEQA Guidelines §15088, LAWA 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 5 comment letters were received during the public review period; no written comments were submitted at the public workshop on May 22, 2014. 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 are included in Appendix A of this document. Chapter 2 of this document presents, on a letter-by-letter basis, each comment which is then followed immediately by a response, for all comments received during the review period for the Draft EIR (May 8, 2014 through June 23, 2014). The comments and responses are organized and grouped together into categories based on the affiliation of the commenter. The comments are presented in the following order: state agencies, local agencies, and public comments (i.e., letters from private citizens, organizations, etc.). Chapter 3 of this document provides corrections and additions to information presented in the Draft EIR.

Together with the Draft EIR, the responses to comments, along with corrections and additions to the Draft EIR, and list of commenters, constitute the Final EIR. Pursuant to CEQA, the Final EIR is not circulated for another round of comments and responses. The Final EIR is presented to the decision-makers for their use in considering the proposed Project. Interested persons may comment on the Final EIR, including these responses, in the course of the decision-making process related to the Project; however, LAWA is not required to provide responses to such comments.

1.2 Indices of Comment Letters

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the first letter within the group of state agencies submitting comments on the Draft EIR is from the State of California, Department of Transportation, and the text of the letter is considered to have 5 individual comments. The subject of the letter was assigned the alphanumeric label “NRSA-AS00001,” representing “Runway 6L-24R and Runway 6R-24L RSA (RSA) and Associated Improvements Project-Agency-State-Letter No. 1.” The same basic format and approach is used for the comment letters from local agencies (“AL”), and public comments (“PC”).

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

1. Introduction and Indices

<u>Letter ID Prefix</u>	<u>Description</u>
AS	State Agency
AL	Local Agency
PC	Public Comment

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 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 Appendix A of this document.

Immediately following each typed comment is a written response. 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 as described above. For example, a response may indicate "Please see response to comment NRSA-AL00001-2" if that response addresses the same concern expressed in a different comment.

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

1. Introduction and Indices

Index by Letter Identification (ID) Number

Letter ID	Commenter	Affiliation/Agency	Department	Date
NRSA-AS00001	Watson, Dianna	Caltrans, District 7	IGR/CEQA Branch	06/10/2014
NRSA-AS00002	Courtney, Betty	State of California – Natural Resources Agency	Department of Fish and Wildlife	06/19/2014
NRSA -AL00001	Lichman, Barbara E.	Buchalter Nemer (Cities of Inglewood, Culver City, Ontario, and County of San Bernardino)		06/09/2014
NRSA-PC00001	DesForges, Daniel			06/09/2014
NRSA-PC00002	Acherman, Robert and Schneider, Denny	ARSAC		06/09/2014

Index by Commenter

Commenter	Affiliation/Agency	Department	Date	Letter ID
Acherman, Robert and Schneider, Denny	ARSAC		06/09/2014	NRSA-PC00002
Courtney, Betty	State of California – Natural Resources Agency	Department of Fish and Wildlife	06/19/2014	NRSA-AS00002
DesForges, Daniel			06/09/2014	NRSA-PC00001
Lichman, Barbara E.	Buchalter Nemer (Cities of Inglewood, Culver City, Ontario, and County of San Bernardino)		06/09/2014	NRSA -AL00001
Watson, Dianna	Caltrans, District 7	IGR/CEQA Branch	06/10/2014	NRSA-AS00001

1. Introduction and Indices

Index by Affiliation

Affiliation/Agency	Department	Commenter	Date	Letter ID
ARSAC		Acherman, Robert and Schneider, Denny	06/09/2014	NRSA-PC00002
Buchalter Nemer (Cities of Inglewood, Culver City, Ontario, and County of San Bernardino)		Lichman, Barbara E.	06/09/2014	NRSA-AL00001
Caltrans, District 7	IGR/CEQA Branch	Watson, Dianna	06/10/2014	NRSA-AS00001
State of California – Natural Resources Agency	Department of Fish and Wildlife	Courtney, Betty	06/19/2014	NRSA-AS00002
		DesForges, Daniel	06/09/2014	NRSA-PC00001

1. Introduction and Indices

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2.0 COMMENTS AND RESPONSES

Refer to Appendix A of the Final EIR for a copy of the comment letters received on the Runway 6L-24R and Runway 6R-24L RSA and Associated Improvements Project Draft EIR. The following provides the comments and individual responses to said comments:

NRSA-AS00001 **Watson, Dianna** **California Department of
Transportation, District 7,
Transportation Planning
IGR/CEQA Branch** **6/10/2014**

NRSA-AS00001-1

Comment: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would include runway safety area (RSA) improvements to the two northern runways at Los Angeles International Airport (LAX).

Response: Comment noted.

NRSA-AS00001-2

Comment: Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from the Department. Any modifications to State facilities must meet all mandatory design standard and specifications. A truck/traffic construction management plan may be needed for this project if any work to be constructed near or at the State facilities.

Response: Comment noted. All work associated with the Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project would occur on LAX property. No work is anticipated within the State Right-of-way, nor are any modifications to State facilities required for the proposed Project. As described on page 4.7-38 in Chapter 4, *Construction Surface Transportation*, of the Draft EIR, and in accordance with the applicable LAX Master Plan Commitment C-1, it is anticipated that a ground transportation/construction coordination office will be established for the proposed Project. Furthermore, the LAWA Construction Coordination and Logistics Management (CALM) team, discussed in detail in Section 4.7.3.8 of the Draft EIR, provides for the implementation of LAX Master Plan Commitment C-1.

NRSA-AS00001-3

Comment: Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water.

2. Comments and Responses

Response: Comment noted. As noted on pages 4.5-25 and 4.5-26 of the Draft EIR, the proposed Project contains design features for the management and treatment of stormwater. The recommended treatment best management practices (BMPs) for the proposed Project include the use of catch basin inserts (mechanical type) for drop inlets and screens (mechanical type) for curb side inlets.

In accordance with the applicable LAX Master Plan Commitment HWQ-1 described on page 4.5-26 of the Draft EIR, a detailed drainage plan for LAX was developed, which includes the area of the proposed Project. LAWA will adhere to the approved drainage plan developed for LAX.

NRSA-AS00001-4

Comment: Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

Response: Comment noted. In accordance with the applicable LAX Master Plan Commitment ST-12 described on page 4.7-39 of the Draft EIR, it is anticipated that truck activity will be scheduled to avoid the peak commute periods of 7:00 AM to 9:00 AM and 4:30 PM to 6:30 PM.

NRSA-AS00001-5

Comment: If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 140514AL.

Response: Comment noted.

NRSA-AS00002 **Courtney, Betty** **State of California – Natural Resources Agency, Department Of Fish and Wildlife** **6/19/2014**

NRSA-AS00002-1

Comment: The California Department of Fish and Wildlife (Department) has reviewed the above referenced Draft Environmental Impact Report (DEIR) prepared by the Los Angeles World Airports (LAWA) acting as the Lead Agency under California Environmental Quality Act (CEQA). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq.

2. Comments and Responses

The proposed Project site is located One World Way, Los Angeles, California, 90045. Los Angeles Airport (LAX) is bounded to the north by Westchester Blvd. to the east by Sepulveda Blvd. to the south by Imperial Highway and to the west by Pershing Drive. Communities surrounding LAX include Westchester, Playa del Rey, and El Segundo.

In order to comply with Federal Aviation Administration (FAA) requirements, LAWA is proposing to improve the runway safety areas of the two northern runways at LAX (Runway 6L-24R and Runway 6R-24L) as well as relocating airport service roads, closing LAWA equipment parking areas, relocation of security gates, relocation of a portion of the Air Operations Area fence, realignment of the taxiway holdbars, pavement reconstruction of the eastern portion of Runway 6L-24R, and pavement reconstruction of taxiway AA. The realignment of service roads would require approximately 1-acre of Argo Ditch to be placed in a box culvert below ground.

Response: Comment noted. Please see responses to comments NRSA-AS00002-2 through NRSA-AS00002-4 below.

NRSA-AS00002-2

Comment: The Department offers the following comments and recommendations to assist the LAWA in avoiding or minimizing potential project impacts on biological resources:

Waters of the State

As part of the project, LAWA is proposing to convert approximately 1 acre of Argo Ditch, which includes wetland and riparian habitat, to an underground culvert. The Department recognizes the need for LAWA to comply with FAA regulations, which discourage any form of habitat creation or enhancement within several miles of LAX runways, for safety reasons. Therefore, the Department recommends LAWA implement mitigation for impacts to Argo Ditch, outside of this FAA safety zone, at a ratio of no less than 2-acres of creation/restoration for every 1-acre of impact. Mitigation should be of the same vegetation communities that comprise the impact area and should provide similar or improved function and value to the watershed.

The Department recommends LAWA notify the Department pursuant to section 1600 et seq. of the Fish and Game Code, for impacts related to this project. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) EIR for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the EIR should fully identify the potential impacts to the stream or riparian resources and provide

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adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Response: Comment noted. As identified in Chapter 3 of this Final EIR, as well as the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project, LAWA will implement a Project-specific Mitigation Measure, *MM-HWQ (RSA-N)-1*, to mitigate impacts to the Argo Ditch at a minimum ratio of 2:1 due to permanent loss of up to 720 linear feet of the Argo Ditch. Mitigation would occur at an off-airport location, and may include restoration, establishment, enhancement, preservation, mitigation banking, and in-lieu fee or equivalent as coordinated with the respective agencies. LAWA has met with the Department to discuss the proposed Project and is in the process of drafting a Lakebed and Stream Alteration Agreement (LSA) for the proposed impacts to the Argo Ditch. LAWA will coordinate with the Department to finalize an LSA for the proposed Project and to identify suitable locations for the required mitigation.

NRSA-AS00002-3

Comment: Rare Plants

The biological assessment indicated that Lewis' evening primrose (*Camissoniopsis lewisii*), a California Native Plant Society Rank 3 plant, occurs within the project area. The DEIR includes preconstruction surveys and flagging plants for avoidance as mitigation measures. If avoidance is not feasible, relocation of plants or planting seeds collected from impacted individuals.

Based on the surveys conducted to date, the DEIR should be able to estimate the acreage and number of individuals estimated to be impacted, and whether avoidance is feasible. If avoidance is not feasible, it is recommended the final EIR include specific mitigation measures to ensure appropriate mitigation is required. The Department recommends preserving off-site land with an existing population of Lewis' evening primrose with a conservation easement as a mitigation measure. If seed or plants must be collected, planning should be included in the final EIR to ensure this takes place at the appropriate time of year. Any required restoration site should be clearly identified in a Habitat Mitigation and Management Plan for the project. It is recommended the HMMP have success criteria, outline permanent protection measures and funding for the restoration, identify a funding mechanism for the proposed mitigation, and be submitted to the Department for review and approval.

Response: Comment noted. As identified in Chapter 3 of this Final EIR, as well as the Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project, LAWA will implement a Project-specific Mitigation Measure, *MM-BC (RSA-N)-1*, to mitigate potential impacts to the Lewis' evening primrose if these plants cannot be avoided. LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the Lewis' evening primrose in coordination with the appropriate resource agencies. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of

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impact shall be delineated within areas of the Los Angeles/El Segundo Dunes or equivalent. Collected seed shall be broadcast (distributed) after the first wetting rain following or concurrent with the associated impact, preferentially in the fall or early winter. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of Lewis' evening primrose for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

NRSA-AS00002-4

Comment: Thank you for this opportunity to provide comments. Please contact Ms. Kelly Schmoker, Senior Environmental Scientist (Specialist) at Kelly.Schmoker@wildlife.ca.gov or (949) 581-1015 if you should have any questions and for further coordination on the proposed Project.

Response: Comment noted.

NRSA-AL00001 **Lichman, Barbara** **Buchalter Neme for Cities of** **6/9/2014**
Inglewood, Culver City, and Ontario
("Cities") and County of San
Bernardino ("County")

NRSA-AL00001-1

Comment: The following constitutes the comments of the City of Culver City ("Culver City") concerning the "Draft Environmental Impact Report ("DEIR") for the Runway 6L-24R and Runway 6R-24L Runway Safety Area ("RSA") and Associated Improvements Project at Los Angeles International Airport ("LAX") ("Proposed Project").

Response: Comment noted. Please see responses to comments NRSA-AL00001-2 through NRSA-AL00001-5 below.

NRSA-AL00001-2

Comment: I. THE PROPOSED PROJECT'S PURPOSE AND NEED IS AMBIGUOUS AT BEST

As a threshold matter, Culver City is somewhat confused by the stated purpose and need for the Proposed Project. On the one hand, Culver City understands the importance of runway safety areas to the safe operations of airports. In this case, however, the Proposed Project, which is aimed at rehabilitating and

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improving the runway safety areas on the North Runway Complex by December, 2015, seem to have been rendered obsolete by the already approved Specific Plan Amendment Study (“SPAS”) project, which calls for movement of the northernmost runway, Runway 6L-24R, 260 feet north. If the SPAS project is carried out as approved, the improved RSA for Runway 6L/24R will be demolished, along with not only the existing runway, but also the Federal Aviation Administration’s (“FAA”) and Los Angeles World Airport’s (“LAWA”) investment in it, and rebuilt 260 feet north at further government expense.

Compounding the confusion caused by the seeming inconsistency is the absence of its disclosure in the DEIR. In Section 3.6, for example, which purports to discuss the development setting and related projects, no reference is made in the discussion of the SPAS project to any plan to relocate Runway 6L-24R. Consequently, the public is left with a false impression that the Proposed Project and SPAS project are unrelated, which is not the case, as their activities clearly overlap. Nor does the fact that the improvements included in the SPAS project “still require a number of federal and local approvals, including completion of environmental review documents and processes, and are several years away from implementation...,” see DEIR, §4.1, Table 4.1-14, n. 3, p. 4.1-32, change the uncertainty with respect to the scope of the Proposed Project, as those improvements are already approved by the Los Angeles City Council, and are manifestly intended to be implemented.

Response: Comment noted. As discussed in Section 2.2, *Project Objectives*, of the Draft EIR, the main objective of the proposed Project is to comply with Public Law 109-115, which require that all RSAs at 14 CFR Part 139 airports must meet FAA design standards by December 31, 2015. This is a federal mandate with which LAWA must comply immediately, and is independent of any future action that may be taken in connection with the SPAS. The potential future relocation of Runway 6L-24R as contemplated in the SPAS is subject to future detailed planning, engineering, and project-level CEQA review, as well as FAA review under the National Environmental Policy Act (NEPA) before any work can be done. These processes cannot be completed prior to the December 31, 2015 deadline by which LAWA must implement RSAs compliant with FAA design standards, as required by Public Law 109-115. Therefore, LAWA is proposing to implement the Runway 6L-24R and Runway 6R-24L RSA and Associated Improvements Project as stated in the Draft EIR. As the operator of Los Angeles International Airport, LAWA is responsible for complying with all applicable federal mandates and for providing a safe operating environment for aircraft utilizing the airport. The proposed Project will bring Runway 6L-24R in compliance with FAA RSA design standards by December 31, 2015, as required by Public Law 119-115, and will also provide improved runway pavement that will allow continued use of Runway 6L-24R for aircraft operations at least until the relocation of Runway 6L-24R could be implemented.

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NRSA-AL00001-3

Comment: II. THE PROJECT DEFINITION, LIKE ITS PURPOSE AND NEED, IS INCOMPLETELY DEFINED

An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR. *San Joaquin Raptor/Wildlife Reserve Center v County of Stanislaus*, 27 Cal.App.4th 713, 730 (1994). Nevertheless, the DEIR here attempts to defy that requirement by defining the Proposed Project by only one-half of its activities. Specifically, the DEIR asserts that “[d]ue to complexities with interactions for aircraft operating on the two runways, additional analysis and coordination with FAA needs to occur before LAWA can identify an alternative that will address all RSA deficiencies for Runway 6R-24L.” DEIR § 2.2.1, p. 2-19. Thus, Runway 6R-24L seems to have been omitted from the equation.

Moreover, the alternative that is designated for one-half the total Proposed Project is not defined at a "project" level of specificity. Instead, the DEIR asserts that “[f]igures show project elements at a planning level of detail. Final design project refinement may result in requirements that vary slightly from those shown herein.” DEIR, § 2.4, n. 18, p. 2-12. In other words, while the activities proposed in the DEIR relate to a single project, not a comprehensive plan involving other projects throughout LAX, the DEIR proposes to analyze the Proposed Project at a general level of detail, and acknowledges that the more general analysis may not be entirely accurate. Given this caveat, the DEIR’s disclosure appears inadequate.

Response: Comment noted. As stated in Chapter 2, Section 2.4 of the Draft EIR, in order to meet the requirements of Public Law 109-115, LAWA is proposing to implement incremental improvements to Runway 6L-24R and Runway 6R-24L by December 31, 2015. However, the proposed improvements to Runway 6R-24L will not address all non-compliance issues. LAWA is currently evaluating alternatives in coordination with FAA to address all of the RSA non-compliance issues for Runway 6R-24L and will undertake those improvements in the near future. The improvements currently being proposed by LAWA for Runway 6R-24L will improve the RSA for this runway and can be implemented prior to the federal mandate of December 31, 2015.

The proposed Project would involve the covering of portions of the Argo Ditch, the relocation of a portion of a service road parallel to Lincoln Boulevard, closure of a portion of a service road located within the Runway 6L-24R RSA south of the runway, relocation of a portion of a service road located within the Runway 6R-24L RSA north of the runway, and closure of parking areas located within the Runway 6R-24L RSA east of the runway. Declared distances would also be implemented on Runway 6R-24L. The Runway 6R ASDA and LDA would be reduced by 115 feet to provide a 1,000-foot RSA from the Runway 6R localizer.

The proposed improvements would not correct the 104-foot deficiency for the Runway 6R arrival RSA, the 835-foot deficiency for the Runway 24L RSA, and would not remove the portion of the service road located within the RSA south of

2. Comments and Responses

the runway. LAWA is considering alternatives to address these RSA deficient issues, but due to complexities with interactions for aircraft operating on the two runways, additional analysis and coordination with FAA needs to occur before LAWA can identify an alternative that will address all RSA deficiencies for Runway 6R-24L. Due to the federally mandated deadline of December 31, 2015, LAWA decided to improve the RSA for Runway 6R-24L as much as possible by the deadline and is working with FAA to identify an acceptable solution that will meet FAA RSA design standards. The impacts associated with these Project elements are evaluated and discussed in the Draft EIR. As noted in Chapter 5 of the Draft EIR, a number of alternatives have been considered and rejected for technical and financial reasons. Once an acceptable alternative has been identified, LAWA will prepare the required environmental documentation to comply with both CEQA and NEPA.

The Draft EIR evaluates the proposed Project at a project-level detail, in compliance with CEQA. Because design of the proposed Project has not been completed, some refinements to the Project may occur during the design process. For example, the Draft EIR evaluates covering up to 720 feet of the Argo Ditch; this represents the maximum extent of the Argo Ditch that would be affected by the proposed Project. During design, LAWA will examine potential ways to minimize the coverage of the Argo Ditch, which would result in less environmental impact. However, to be conservative, LAWA has identified and evaluated the maximum coverage of the Argo Ditch associated with the proposed Project. This is however consistent with the requirements of CEQA. (See *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [Final project design does not need to be completed at the time of certification of the EIR.].) Thus, the disclosure of potential environmental impacts associated with the proposed Project are adequate and in compliance with CEQA.

NRSA-AL00001-4

Comment: III. THE DEIR'S CUMULATIVE AIR QUALITY ANALYSIS IS NOT SPECIFIC AS TO WHETHER IT INCLUDES THE AIR QUALITY IMPACTS OF RELOCATING RUNWAY 6L-24R

As the DEIR fails to disclose the already approved relocation of Runway 6L-24R, it is equally unclear as to whether the Proposed Project's cumulative air quality analysis includes the emissions from the Runway 6L-24R relocation. Although the DEIR claims that "conservative assumptions were made relative to construction of such improvements beginning early enough to overlap construction of the proposed Project," DEIR, § 4.1, Table 4.1-14, n. 3, p. 4.1-32, the DEIR is not specific as to which aspects of the SPAS project are included in the "improvements" referenced in Table 4.1-14. Given the significant emissions of CO, VOC [ozone precursors] and NOx, even after mitigation, DEIR, § 4.1.9 [finding that "[e]ven with incorporation of feasible construction-related mitigation measures as described above, the maximum peak daily construction-related regional mass emissions resulting from the proposed Project would be significant for CO, VOC, and NOX, as shown by the emissions inventory"), and DEIR, § 4.6,

2. Comments and Responses

subsection 4.6.6.2, p. 4.6-21, finding that 52 residential parcels, or 364 persons, in the City of Inglewood, would experience an increase of 1.5 dB or higher, during the approximately 4-month closure of Runway 6L-24R and 2-month displaced threshold period], it is critical for the public to know if the Proposed Project's emissions levels would be even more significant with the inclusion of the Runway 6L-24R relocation, and, if so, by how much.

Response: Comment noted. As noted in Section 4.1.1 (Air Quality analysis), the proposed project would not affect operations at LAX upon completion. Consequently the EIR's analysis (including the cumulative analysis) focuses upon construction related emissions associated with the proposed project. As described in Sections 4.1.1.2 and 4.1.2.1, construction of the proposed Project would occur entirely in the year 2015.

As described in greater detail in Response NRSA-AL00001-2, the potential future relocation of Runway 6L-24R would not occur during the cumulative timeframe of the proposed project (i.e. 2015) and is subject to future detailed planning, engineering, and project-level CEQA review, as well as FAA review under NEPA. Therefore, construction of any SPAS-related improvements would not overlap with implementation of the proposed Project. Nevertheless, Table 4.1-14 (Item 11) includes a general projection of Master Plan development and conservatively assumes that some construction of this development could overlap with the proposed Project. This estimate is based upon a general estimate of average daily construction emissions for the overall 11-year development duration, assuming that the approved Master Plan is fully implemented (SPAS Alternative 3). See Table 3-1 in Section 3, *Overview of Project Setting*, in Volume 1 of the EIR. Emissions shown in Table 4.1-14, within Section 4.1, *Air Quality*, of the Draft EIR, are based on the estimate of average daily construction emissions converted to tons per year, and consequently provide a conservative estimate. This estimate is not however specific to any individual SPAS or Master Plan component.

Temporary noise impacts from the 4-month closure of Runway 6L-24R and 2-month displaced threshold period are effects of the proposed Project only. As discussed in Section 4.6.7 of the Draft EIR, only projects and growth due to occur in the immediate proposed Project area, including LAX Master Plan projects as well as other capital improvement projects undertaken by LAWA and other local agencies, would be likely to contribute to cumulative noise impacts. Using this approach, only projects estimated to occur during the same timeframe and in the same general location of the proposed Project were considered in the cumulative noise analysis. As the Runway 6L-24R relocation included as part of the SPAS Alternatives 1 and 9 would not be under construction at the same time as the proposed Project, cumulative noise impacts for the proposed Project do not include the Runway 6L-24R relocation.

As noted in Section 4.6.2 of the Draft EIR, all properties zoned residential that would experience an increase of 1.5 dB or higher, during the approximately 4-month closure of Runway 6L-24R and 2-month displaced threshold period, have been invited or are active in the City of Inglewood's Residential Sound Insulation

2. Comments and Responses

Program (RSIP). Those property owners that have not responded have been sent letters inviting them to participate in the City of Inglewood's RSIP. As noted in Section 4.6.6 of the Draft EIR, there are 52 parcels containing residences that would be impacted by an increase of 1.5 dB CNEL or greater during the 4-month closure of Runway 6L-24R and the 2-month period when Runway 6L-24R would be reduced to 7,000 feet. Of these 52 parcels, 8 have been mitigated under the RSIP, 3 are in process of being mitigated, 6 have been invited to participate but have not responded, 1 has declined to participate in the RSIP, 5 are not eligible for sound insulation because they were constructed after building codes were modified to incorporate sound attenuation into new residential construction and thus, are not eligible for the RSIP, and 29 are not eligible because they are zoned C-2 (commercial).

Further environmental review of the Runway 6L-24R relocation as part of SPAS will be conducted at a time when LAWA determines necessary; cumulative air quality and noise impacts will be studied and disclosed at that time.

NRSA-AL00001-5

Comment: Culver City thanks LAWA for this opportunity to comment and looks forward to responses that more fully disclose the "raison d'etre" for this apparently duplicative project as well as its impacts.

Response: Comment noted. Please see responses to comments NRSA-AL00001-2 through NRSA-AL00001-4.

NRSA-PC00001 DesForges, Daniel

6/9/2014

NRSA-PC00001-1

Comment: How much of the work and money spent on this project will have been wasted if runway 6L-24R is moved north 260 feet under SPAS Alternate 1?

Response: Comment noted. Please see response to comment NRSA-AL00001-2. As the operator of Los Angeles International Airport, LAWA is responsible for complying with all applicable federal mandates and for providing a safe operating environment for aircraft utilizing the airport. The proposed Project will bring Runway 6L-24R in compliance with FAA RSA design standards by December 31, 2015, as required by Public Law 119-115, and will also provide improved runway pavement that will allow continued use of Runway 6L-24R for aircraft operations.

2. Comments and Responses

NRSA-PC00002 **Acherman, Robert** **Alliance for a Regional Solution to** **6/9/2014**
 Schneider, Denny **Airport Congestion (ARSAC)**

NRSA-PC00002-1

Comment: ARSAC is a grassroots organization has been dedicated to air safety for almost twenty years in Southern California and LAX in particular. We appreciate the intent on improving the Northside without expanding north.

Response: Comment noted. Please see responses to comments NRSA-PC00002-2 through NRSA-PC00002-3 below for a response to all comments submitted by the commenter on the Draft EIR.

NRSA-PC00002-2

Comment: With regard to the outboard runway, 24R, we have only one nominal concern addressing the covered capacity of the portion of the ARGO flood control channel being based on a 25 year storm instead of a 100 year storm. If a storm results in the greater volume of water than assumed for flow into this channel will the overflow impact local Westchester or onto LAX property and possibly airside areas on the north?

Response: Comment noted. As discussed in Section 4.5, *Hydrology and Water Quality*, of the Draft EIR, the proposed Project would cover approximately 720 linear feet of the Argo Ditch at the eastern end of Runway 6L-24R with a culvert drainage structure, designed to handle current stormwater demands. The proposed Project would result in a net increase in impervious area of 2.0 acres; analysis of the pre- and post-development overall flow rates concludes that the proposed Project would result in a net increase in stormwater runoff for a 25-year storm of 1.85 cubic feet per second (cfs). The 25-year frequency design storm, not the 100-year frequency design storm, is the recommended storm design flow in conformance with the Los Angeles County Department of Public Works (LACDWP) Hydrology Manual.¹

A 1.85 cfs stormwater flow increase represents less than a 1 percent difference when compared to the without Project conditions, which has a flood discharge of 252 cfs. As the capacity of the Argo Ditch is greater than 3,500 cfs, the proposed Project would not exceed the capacity of existing or planned stormwater drainage systems. Previous studies indicate that the Argo Ditch conveyance systems are adequate for the LADPW 50-year design storm; analysis of a 100-year design storm has not been performed.² Based on the nominal increase in stormwater flow from the proposed Project, it would not have a significant effect on

¹ Los Angeles County Department of Public Works, Hydrology Manual, Chapter 4.3 (page 30), January 2006.

² Los Angeles World Airports, *LAX Specific Plan Amendment Study Draft Environmental Impact Report*, July 2012.

2. Comments and Responses

stormwater flows associated with different storm events. Additionally, the proposed Project would include design features to ensure that stormwater runoff conveyance structures would be able to accommodate any increased runoff generated by the proposed Project. As such, the proposed Project would not result in stormwater overflows that would impact Westchester or the northern LAX airfield.

NRSA-PC00002-3

Comment: We recognize that completion of the plans to improve inboard runway, 24L, remain unresolved and ask to be appraised to the proposed solutions when determined.

If you have questions, then please contact us. We look forward to working more closely with you.

Response: Comment noted.

3.0 CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

3.1 Introduction

As provided in Section 15088(d) of the California Environmental Quality Act guidelines, responses to comments may take the form of a revision to a Draft Environmental Impact Report (EIR) or may be a separate section in the Final EIR. This chapter complies with the latter of these two guidelines and provides changes as a result of clarifications to, and comments received on, the Draft EIR for the proposed Project. The following revisions are hereby made to the text of the Draft EIR. Changes in the text are signified by strikeouts where text is removed and shown with underline 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 more severe significant environmental impacts of the Project.

3.2 Corrections and Additions to the Draft EIR Text

4.1 Air Quality

Revise the heading of Table 4.1-14 under Section 4.1.7, Cumulative Impacts, on Page 4.1-32, of Section 4.1, *Air Quality*, as follows:

Peak Potentially Overlapping ~~Daily~~ Tons/Quarter Emissions

4.2 Biological Resources

Revisions to Section 4.2, *Biological Resources*, as follows:

4.2.5 Applicable LAX Master Plan Commitments and Mitigation Measures

As part of the LAX Master Plan, LAWA adopted a number of mitigation measures pertaining to biotic communities (denoted with "BC") and endangered and threatened species (denoted with "ET") in the Alternative D Mitigation Monitoring and Reporting Program (MMRP). The mitigation measures listed below are relevant to the analysis of biological resources associated with the proposed Project. Since the Project site is located within the LAX Master Plan boundaries, LAWA will also fulfill the commitments it has made in the LAX Master Plan for the proposed Project. The following ~~commitments~~ mitigation measures are applicable to the proposed Project and are considered in the Biological Resources analysis herein.

The following applicable mitigation measures were included within the Los Angeles International Airport, (LAX) Bradley West Project (BWP), Final EIR and ~~have~~ since been adopted into the LAX MMRP. Due to the sighting of a burrowing owl just south of Westchester Parkway, ~~this mitigation measure~~ MM-BC (BWP)-4 would apply to the Proposed Project. MM-BC (BWP)-8 would also apply to the proposed Project.

3. Corrections and Additions to the Draft EIR

4.2.7 Cumulative Impacts

LAWA projects would be required to implement BMPs, follow regulations, and apply project design features and LAX Master Plan EIS/EIR Commitments Mitigation Measures. The proposed Project includes project design features and BMPs specifically designed to reduce biological resources impacts to less than significant. Therefore, impacts related to biological resources under the proposed Project are not cumulatively considerable, and cumulative impacts would be less than significant.

4.2.8 Mitigation Measures

LAWA will implement a Project-specific Mitigation Measure, MM-BC (RSA-N)-1, to mitigate potential impacts to the Lewis' evening primrose if these plants cannot be avoided. If avoidance of Lewis' evening primrose is not feasible, LAWA or its designee shall prepare and implement a plan to compensate for the loss of individuals of the Lewis' evening primrose in coordination with the appropriate resource agencies. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact shall be delineated within areas of the Los Angeles/El Segundo Dunes or equivalent. Collected seed shall be broadcast (distributed) after the first wetting rain following or concurrent with the associated impact, preferentially in the fall or early winter. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of Lewis' evening primrose for a period of not more than five years. Performance criteria shall include the establishment of an equal number of plants as that impacted following the distribution of seed within the mitigation site. Performance criteria shall also include confirmation of recruitment for two years following the first year flowering is observed and establishment of individuals throughout the mitigation area within three years following the first year flowering is observed.

4.4 Human Health Risk Assessment

Revise the following information under Section 4.4.6.3, Acute Non-Cancer Hazards Risk, on Page 4.4-25, of Section 4.4, *Human Health Risk Assessment*, as follows:

4.4.6.3 Acute Non-Cancer Hazards Risk

As shown above, construction-related incremental maximum acute hazard quotients for acrolein for construction of the proposed Project are estimated to be 1.4 for residents living at the peak hazard location, 0.7 for school children, 1.1 for recreational users, and 2.1 for off-site adult workers. However, 300 of 328 grid nodes have incremental acute hazard quotients for acrolein of less than 1; 73 of these receptors show a negative hazard quotient, meaning the short-term impacts actually improve during construction of the proposed Project. Of the twenty-eight grid nodes with incremental acute hazard quotients for acrolein greater than 1, only one of the grid nodes is greater than 2. Additional receptors located at 50 meter increments to the south of the airport show acrolein concentrations falling below the threshold of significance between 50 and 200 meters south of the fence-line. To the west, acrolein concentrations fall below the threshold of significance at approximately 100 meters west of the fence-line. To the east, acrolein concentrations fall below the threshold of significance at between 150 and 200 meters east of the fence-line. General acute hazard quotients for acrolein at all receptor nodes are shown in **Figure 4.4-2**.

3. Corrections and Additions to the Draft EIR

4.5 Hydrology and Water Quality

Revisions to Section 4.5, *Hydrology and Water Quality*, as follows:

4.5.5.3 Applicable LAX Master Plan Commitments and Mitigation Measures

As part of the LAX Master Plan Environmental Impact Statement/Environmental Impact Report (EIS/EIR), LAWA has committed to implementing ~~the following various~~ commitments and mitigation measures pertaining to hydrology and water quality in order to avoid or reduce environmental impacts. Since the DSA is located within the LAX Master Plan boundaries, LAWA will also fulfill the applicable ~~the commitments it has made in the~~ LAX Master Plan Commitment for the proposed Project. The following commitments ~~are~~ is applicable to the proposed Project and ~~are~~ is considered in the Hydrology and Water Quality analysis herein.

4.5.6.2.1. Hydrology

With implementation of these Project Design Features, ~~construction~~ operational impacts related to hydrology due to increased runoff would be less than significant. Additionally, the proposed Project would be subject to LAX Master Plan Commitments ~~and Mitigation Measures~~ HWQ-1 ~~and MM-HWQ-1~~. Proposed Project elements would be designed to accommodate any additional future flows as a result of the proposed Project.

4.5.8. Mitigation Measures

Impacts to the Argo Ditch, including wetland removal, would occur in conjunction with U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife coordination, and mitigation would be implemented to ensure a less than significant impact from construction of the proposed undertaking. LAWA will implement a Project-specific Mitigation Measure, MM-HWQ (RSA-N)-1, to mitigate impacts to the Argo Ditch at a minimum ratio of 2:1 due to permanent loss of up to 720 linear feet of the Argo Ditch. Mitigation may include restoration, establishment, enhancement, preservation, mitigation banking, and in-lieu fee or equivalent as coordinated with the respective agencies. LAWA will coordinate with the Department of Fish and Wildlife to discuss the proposed Project and complete a Lakebed and Stream Alteration Agreement (LSA) for the proposed impacts to the Argo Ditch. LAWA will coordinate with the Department to finalize an LSA for the proposed Project and to identify suitable locations for the required mitigation.

5.0 Alternatives

Revisions to Section 5.0, *Alternatives*, as follows:

5.4.2.1 No Project Alternative

Although the ~~No Action~~ Project alternative does not meet the objectives for the proposed Project, it was retained for further consideration as required by CEQA Guidelines, § 15126.6.

3. Corrections and Additions to the Draft EIR

5.5.1.1.2 Biological Resources

Construction

Under the No Action Project Alternative, none of the aforementioned grading, ground disturbance or wetland removal would occur. If as-needed maintenance activities are undertaken, these activities would primarily occur on existing paved surfaces. Thus, less than significant impacts to biological resources from the No Action Project Alternative would be anticipated.

Operations

Implementation of the proposed Project would not cause a change in aircraft operations or routes, or any other operations at LAX. As a result, it is anticipated that operations of the proposed Project would have less than significant impacts to biological resources. Similarly, less than significant impacts to biological resources from the No Action Project Alternative would be anticipated.

Cumulative

The proposed Project includes project design features, BMPs, and LAX Master Plan EIS/EIR Commitments specifically designed to reduce biological resource impacts to less than significant. Therefore, impacts related to biological resources under the proposed Project are not cumulatively considerable, and cumulative impacts would be less than significant. The No Project Alternative would not result in any ground or wetland disturbance, and minimal construction activities would occur. Therefore cumulative impacts from the No Action Project Alternative would also be less than significant.

5.5.1.1.3 Greenhouse Gasses

Construction

Under the No Action Project Alternative, none of the aforementioned grading, ground disturbance, or wetland removal would occur. If as-needed maintenance activities are undertaken, these activities would mostly occur on existing paved surfaces. Minimal Greenhouse Gas impacts from the No Action Project Alternative would be anticipated.

Operations

Under the No Action Project Alternative, no change to LAX operations would occur. If as-needed maintenance activities are undertaken, these activities would occur on existing paved surfaces. Minimal Greenhouse Gas impacts from the No Action Project Alternative would be anticipated.

Cumulative

Under the No Action Project Alternative, no change to LAX operations would occur and minimal as-needed maintenance activities would occur. No cumulatively considerable Greenhouse Gas impacts from the No Action Project Alternative would be anticipated.

3. Corrections and Additions to the Draft EIR

5.5.1.1.4 Human Health Risk

Construction

Under the No ~~Action~~ Project Alternative, none of the aforementioned grading, ground disturbance, or wetland removal would occur. If as-needed maintenance activities are undertaken, these activities would mostly occur on existing paved surfaces. Hydrology and water quality impacts from the No ~~Action~~ Project Alternative would be anticipated to be less than significant.

Operations

Under the No ~~Action~~ Project Alternative, none of the aforementioned undeveloped areas would be converted to impervious surfaces and no wetland removal would occur. If as-needed maintenance activities are undertaken, these activities would mostly occur on existing paved surfaces. Hydrology and water quality impacts from the No ~~Action~~ Project Alternative would be anticipated to be less than significant.

Cumulative

The No Project Alternative would not result in any ground or wetland disturbance. If as-needed maintenance activities are undertaken, these activities would occur on existing paved surfaces. Therefore cumulative impacts from the No ~~Action~~ Project Alternative would be less than significant.

5.5.1.1.7 Construction Traffic

Construction

The No Project Alternative would not result in any change in LAX operations or capacity. If as-needed maintenance activities are undertaken, these activities would result in less traffic than assumed under the proposed Project. Therefore traffic impacts from the No ~~Action~~ Project Alternative would be less than significant.

Cumulative

The No Project Alternative would not result in any change in LAX operations or capacity. If as-needed maintenance activities are undertaken, these activities would result in less traffic than assumed under the proposed Project. Therefore cumulative traffic impacts from the No ~~Action~~ Project Alternative would be less than significant.

3. Corrections and Additions to the Draft EIR

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Runway 6L-24R and Runway 6R-24L Runway Safety Area (RSA) and Associated Improvements Project Final EIR

Appendix A

**Original Comment Letters on the Runway 6L-24R and Runway
6R-24L Runway Safety Area (RSA) and Associated
Improvements Project Draft EIR**

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, TRANSPORTATION PLANNING

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337

*Flex your power!
Be energy efficient!*

June 10, 2014

Ms. Evelyn Quintanilla
Los Angeles World Airports
One World Way, Room 218B
Los Angeles, CA 90045

IGR/CEQA No. 140514AL-DEIR
LAX Runway 6L-24R & Runway 6R-24L Runway
Safety Area and Associated Improvements
Vic. LA-01 / PM 28.3, LA-405 / PM 22.216
SCH #: 2014051040

Dear Ms. Quintanilla:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would include runway safety area (RSA) improvements to the two northern runways at Los Angeles International Airport (LAX).

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from the Department. Any modifications to State facilities must meet all mandatory design standard and specifications. A truck/traffic construction management plan may be needed for this project if any work to be constructed near or at the State facilities.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water.

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 140514AL.

Sincerely,

A handwritten signature in black ink, appearing to read "Dianna Watson".

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

NRSA-AS00001



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



June 19, 2014

Ms. Evelyn Quintanilla
Los Angeles World Airports
One World Way, Room 218B
Los Angeles, CA 90045

Subject: Comments on the Draft Environmental Impact Report for LAX Runway 6L-24R and Runway 6R-24L Runway Safety Area and Associated Improvement Project, City of Los Angeles, Los Angeles County (SCH# 2014051040)

Dear Ms. Quintanilla:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) prepared by the Los Angeles World Airports (LAWA) acting as the Lead Agency under California Environmental Quality Act (CEQA). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*

The proposed Project site is located One World Way, Los Angeles, California, 90045. Los Angeles Airport (LAX) is bounded to the north by Westchester Blvd. to the east by Sepulveda Blvd. to the south by Imperial Highway and to the west by Pershing Drive. Communities surrounding LAX include Westchester, Playa del Rey, and El Segundo.

In order to comply with Federal Aviation Administration (FAA) requirements, LAWA is proposing to improve the runway safety areas of the two northern runways at LAX (Runway 6L-24R and Runway 6R-24L) as well as relocating airport service roads, closing LAWA equipment parking areas, relocation of security gates, relocation of a portion of the Air Operations Area fence, realignment of the taxiway holdbars, pavement reconstruction of the eastern portion of Runway 6L-24R, and pavement reconstruction of taxiway AA. The realignment of service roads would require approximately 1-acre of Argo Ditch to be placed in a box culvert below ground.

The Department offers the following comments and recommendations to assist the LAWA in avoiding or minimizing potential project impacts on biological resources:

Waters of the State

As part of the project, LAWA is proposing to convert approximately 1 acre of Argo Ditch, which includes wetland and riparian habitat, to an underground culvert. The Department recognizes the need for LAWA to comply with FAA regulations, which discourage any form of habitat creation or enhancement within several miles of LAX runways, for safety reasons. Therefore, the Department recommends LAWA implement mitigation for impacts to Argo Ditch, outside of this FAA safety zone, at a ratio of no less than 2-acres of creation/restoration for every 1-acre of

impact. Mitigation should be of the same vegetation communities that comprise the impact area and should provide similar or improved function and value to the watershed.

The Department recommends LAWA notify the Department pursuant to section 1600 et seq. of the Fish and Game Code, for impacts related to this project. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) EIR for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the EIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.

Rare Plants

The biological assessment indicated that Lewis' evening primrose (*Camissoniopsis lewisii*), a California Native Plant Society Rank 3 plant, occurs within the project area. The DEIR includes preconstruction surveys and flagging plants for avoidance as mitigation measures. If avoidance is not feasible, relocation of plants or planting seeds collected from impacted individuals.

Based on the surveys conducted to date, the DEIR should be able to estimate the acreage and number of individuals estimated to be impacted, and whether avoidance is feasible. If avoidance is not feasible, it is recommended the final EIR include specific mitigation measures to ensure appropriate mitigation is required. The Department recommends preserving off-site land with an existing population of Lewis' evening primrose with a conservation easement as a mitigation measure. If seed or plants must be collected, planning should be included in the final EIR to ensure this takes place at the appropriate time of year. Any required restoration site should be clearly identified in a Habitat Mitigation and Management Plan for the project. It is recommended the HMMP have success criteria, outline permanent protection measures and funding for the restoration, identify a funding mechanism for the proposed mitigation, and be submitted to the Department for review and approval.

Thank you for this opportunity to provide comments. Please contact Ms. Kelly Schmoker, Senior Environmental Scientist (Specialist) at Kelly.Schmoker@wildlife.ca.gov or (949) 581-1015 if you should have any questions and for further coordination on the proposed Project.

Sincerely,



Betty J. Courtney
Environmental Program Manager I
South Coast Region

ec: Ms. Erinn Wilson, CDFW, Los Alamitos
Mr. Scott Harris, CDFW, Pasadena
Mr. Brock Warmuth, CDFW, Ventura
State Clearinghouse

June 9, 2014

VIA E-MAIL (EQUINTANILLA@LAWA.ORG)

Los Angeles World Airports
Capital Programming and Planning
Land Use and Entitlement Section
Attn: Evelyn Y. Quintanilla
One World Way, Suite 218
Los Angeles, CA 90045

Re: Comments of the City of Culver City on Draft EIR - Runway 6L-24R and
Runway 6R-24L RSA and Associated Improvements Project

Dear Evelyn:

The following constitutes the comments of the City of Culver City ("Culver City") concerning the "Draft Environmental Impact Report ("DEIR") for the Runway 6L-24R and Runway 6R-24L Runway Safety Area ("RSA") and Associated Improvements Project at Los Angeles International Airport ("LAX") ("Proposed Project").

I. THE PROPOSED PROJECT'S PURPOSE AND NEED IS AMBIGUOUS AT BEST

As a threshold matter, Culver City is somewhat confused by the stated purpose and need for the Proposed Project. On the one hand, Culver City understands the importance of runway safety areas to the safe operation of airports. In this case, however, the Proposed Project, which is aimed at rehabilitating and improving the runway safety areas on the North Runway Complex by December, 2015, seem to have been rendered obsolete by the already approved Specific Plan Amendment Study ("SPAS") project, which calls for movement of the northernmost runway, Runway 6L-24R, 260 feet north. If the SPAS project is carried out as approved, the improved RSA for Runway 6L/24R will be demolished, along with not only the existing runway, but also the Federal Aviation Administration's ("FAA") and Los Angeles World Airport's ("LAWA") investment in it, and rebuilt 260 feet north at further government expense.

Compounding the confusion caused by the seeming inconsistency is the absence of its disclosure in the DEIR. In section 3.6, for example, which purports to discuss the development setting and related projects, no reference is made in the discussion of the SPAS project to any plan to relocate Runway 6L-24R. Consequently, the public is left with a false impression that the Proposed Project and SPAS project are unrelated, which is not the case, as their activities

clearly overlap. Nor does the fact that the improvements included in the SPAS project “still require a number of federal and local approvals, including completion of environmental review documents and processes, and are several years away from implementation . . .,” *see* DEIR, § 4.1, Table 4.1-14, n. 3, p. 4.1-32, change the uncertainty with respect to the scope of the Proposed Project, as those improvements are already approved by the Los Angeles City Council, and are manifestly intended to be implemented.

II. THE PROJECT DEFINITION, LIKE ITS PURPOSE AND NEED, IS INCOMPLETELY DEFINED

An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR. *San Joaquin Raptor/Wildlife Reserve Center v. County of Stanislaus*, 27 Cal.App.4th 713, 730 (1994). Nevertheless, the DEIR here attempts to defy that requirement by defining the Proposed Project by only one-half of its activities. Specifically, the DEIR asserts that “[d]ue to complexities with interactions for aircraft operating on the two runways, additional analysis and coordination with FAA needs to occur before LAWA can identify an alternative that will address all RSA deficiencies for Runway 6R-24L.” DEIR, § 2.2.1, p. 2-19. Thus, Runway 6R-24L seems to have been omitted from the equation.

Moreover, the alternative that is designated for one-half the total Proposed Project is not defined at a “project” level of specificity. Instead, the DEIR asserts that “[f]igures show project elements at a planning level of detail. Final design project refinement may result in requirements that vary slightly from those shown herein.” DEIR, § 2.4, n. 18, p. 2-12. In other words, while the activities proposed in the DEIR relate to a single project, not a comprehensive plan involving other projects throughout LAX, the DEIR proposes to analyze the Proposed Project at a general level of detail, and acknowledges that the more general analysis may not be entirely accurate. Given this caveat, the DEIR’s disclosure appears inadequate.

III. THE DEIR’S CUMULATIVE AIR QUALITY ANALYSIS IS NOT SPECIFIC AS TO WHETHER IT INCLUDES THE AIR QUALITY IMPACTS OF RELOCATING RUNWAY 6L-24R

As the DEIR fails to disclose the already approved relocation of Runway 6L-24R, it is equally unclear as to whether the Proposed Project’s cumulative air quality analysis includes the emissions from the Runway 6L-24R relocation. Although the DEIR claims that “conservative assumptions were made relative to construction of such improvements beginning early enough to overlap construction of the proposed Project,” DEIR, § 4.1, Table 4.1-14, n. 3, p. 4.1-32, the DEIR is not specific as to which aspects of the SPAS project are included in the “improvements” referenced in Table 4.1-14. Given the significant emissions of CO, VOC [ozone precursors] and NO_x, even after mitigation, DEIR, § 4.1.9 [finding that “[e]ven with incorporation of feasible construction-related mitigation measures as described above, the maximum peak daily construction-related regional mass emissions resulting from the proposed Project would be significant for CO, VOC, and NO_x, as shown by the emissions inventory”), and DEIR, § 4.6, subsection 4.6.6.2, p. 4.6-21, finding that 52 residential parcels, or 364 persons, in the City of

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Inglewood, would experience an increase of 1.5 dB or higher, during the approximately 4-month closure of Runway 6L-24R and 2-month displaced threshold period], it is critical for the public to know if the Proposed Project's emissions levels would be even more significant with the inclusion of the Runway 6L-24R relocation, and, if so, by how much.

Culver City thanks LAWA for this opportunity to comment and looks forward to responses that more fully disclose the "raison d'etre" for this apparently duplicative project as well as its impacts.

Sincerely,

BUCHALTER NEMER
A Professional Corporation

By 

Barbara Lichman

Question - How much of the work and money spent on this project will have been wasted if runway 6L-24R is moved north 260 feet under SPAS Alternate 1.

RSA 6L-24R/6R-24L
DEIR (CEQA)

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6/9/2014



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June 9, 2014

Via E-mail to "QUINTANILLA, EVELYN" <EQuintanilla@lawa.org>

Evelyn Quintanilla
City of Los Angeles, Los Angeles World Airports
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Los Angeles, CA 90045

Reference: May 2014 DEIR for Northside Runway Safety Area update

ARSAC is a grassroots organization has been dedicated to air safety for almost twenty years in Southern California and LAX in particular. We appreciate the intent on improving the Northside without expanding north.

With regard to the outboard runway, 24R, we have only one nominal concern addressing the covered capacity of the portion of the ARGO flood control channel being based on a 25 year storm instead of a 100 year storm. If a storm results in the greater volume of water than assumed for flow into this channel will the overflow impact local Westchester or onto LAX property and possibly airside areas on the north?

We recognize that completion of the plans to improve inboard runway, 24L, remain unresolved and ask to be appraised to the proposed solutions when determined.

If you have questions, then please contact us. We look forward to working more closely with you.

Sincerely,

Handwritten signature of Denny Schneider in black ink.

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Handwritten signature of Robert Acherman in black ink.

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