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Los Angeles International Airport

Addendum to the Environmental Impact Report for the Los Angeles International Airport Landside Access Modernization Program

Prepared for:

Los Angeles World Airports

Prepared by:

RICONDO

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Table of Contents

1. Purpose	1
2. Previously Approved LAX Landside Access Modernization Program.....	2
3. Project Changes Addressed in this Addendum	5
3.1 Manchester Square Property Relocation.....	5
3.2 APM Backup Power Generators.....	7
3.3 APM Emergency Access Points and Minor Modifications to APM Guideway.....	7
3.4 Parcel and Billboard Acquisition.....	10
3.5 Security Badge Office Relocation.....	10
3.6 Alleyway Merger	11
4. Requirements for Use of an Addendum	14
5. Evaluation of Environmental Impacts	15
5.1 Summary Of Environmental Topics/Resource Areas That Would Not Be Affected By The Proposed Refinements.....	15
5.2 Evaluation Of Environmental Topics/Resource Areas That Would Be Affected By The Proposed Refinements But Would Not Result In Any New Significant Or Substantially More Severe Impacts	16
5.2.1 Air Quality and Human Health Risk.....	16
5.2.2 Construction Noise and Vibration.....	21
5.2.3 Off-Airport Transportation/Traffic.....	24
6. Cumulative Impacts	27
6.1 Air Quality.....	27
6.2 Construction Noise and Vibration	28
6.3 Off-Airport Transportation/Traffic	28
6.4 Analysis of the Proposed Change in the Project.....	28
7. Assessment of Changes in Impacts	29
8. Conclusion.....	30

List of Exhibits

Figure 1: LAX Landside Access Modernization Program Components..... 4

Figure 2: Manchester Square Property Acquisition Status..... 6

Figure 3: APM Emergency Access Point and Additional Crossover Switch Locations..... 9

Figure 4: ITF West and Proposed Security Badging Office.....12

Figure 5: Alleyway Merger13

List of Tables

Table 1: Manchester Square Property Acquisition Status 7

Table 2: APM Platform Distances ¹..... 8

Table 3: Additional Properties to be Acquired.....10

Table 4: Approved Project and Proposed Backup Generator Operational Emissions (2024 and 2035)18

Table 5: Operational Concentrations – 2024 Future With Project and Backup Generators Compared to 2024
Future Without Project.....19

Table 6: Operational Concentrations – 2035 Future With Project and Backup Generators Compared to 2035
Future Without Project.....20

Table 7: Construction Noise Levels at Varying Distances.....23

Table 8: Construction Vibration Levels Estimates.....24

List of Appendices

- Appendix A Air Quality and Human Health Risk
- Appendix B Noise and Vibration
- Appendix C Off-Airport Traffic

1. PURPOSE

Los Angeles World Airports (LAWA) is working to transform the Los Angeles International Airport (LAX or Airport) into a modern airport and to address increasing levels of traffic congestion at and around LAX. LAWA has initiated redevelopment of the ground access system to the Airport, which will include a seamless connection to the regional rail and transit system. On March 2, 2017, the Board of Airport Commissioners (BOAC) certified the LAX Landside Access Modernization Program (Project) Final Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA), and this certification was subsequently affirmed on June 7, 2017 by the Los Angeles City Council. The certified Final EIR for the LAX Landside Access Modernization Program (“certified Final EIR”) contained a project-level analysis of the LAX Landside Access Modernization Program Project, and a program-level analysis of the potential future related development that may occur on land that would become available after construction of Phase 1 of the Project.

This Addendum has been prepared to address modifications to the LAX Landside Access Modernization Program. The certified Final EIR, along with this Addendum, serve as the environmental review of the proposed Project pursuant to the provisions of CEQA, Public Resources Code Section 21000 *et. seq.*, and State and local CEQA Guidelines.¹

As part of the natural progression of the design process, plans for the LAX Landside Access Modernization Program Project have been further refined. Subsequent to completing the CEQA environmental review process for the LAX Landside Access Modernization Program Project, LAWA has refined its plans as follows:

- Inclusion of up to four backup power generators for the Automated People Mover (APM);
- Addition of three emergency access point locations for the APM, another crossover switch, which allows trains to switch from one track to another in case of a disabled train, between the East Central Terminal Area (CTA) APM Station and the Intermodal Transportation Facility (ITF) West APM Station, and minor modifications to the APM guideway in this area to preserve the option for a potential future APM station;
- Acquisition of additional existing billboards and parcels;
- Relocation of the existing Security Badge Office (SBO) to space within the previously approved ITF West; and
- Merger of an alleyway east of the APM Maintenance and Storage Facility (MSF) with new “D” Street and modification of Vesting Tract Map VTTM 73422.

¹ California Administrative Code, Title 14, Division 6, Chapter 3, Sections 15000-15387, “Guidelines for Implementation of the California Environmental Quality Act”; *City of Los Angeles Environmental Quality Act Guidelines*, Adopted July 31, 2002, http://cityplanning.lacity.org/EIR/CEQA_Guidelines/City_CEQA_Guidelines.pdf; City of Los Angeles, L.A. *CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles*, 2006; South Coast Air Quality Management District, *CEQA Air Quality Handbook*, April 1993; South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds*, March 2015, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

Also, due to an extended acquisition process, LAWA is considering beginning construction within the Manchester Square area prior to the relocation of the remaining two residential buildings and the Stella Middle Charter Academy/Bright Star Secondary Charter Academy.

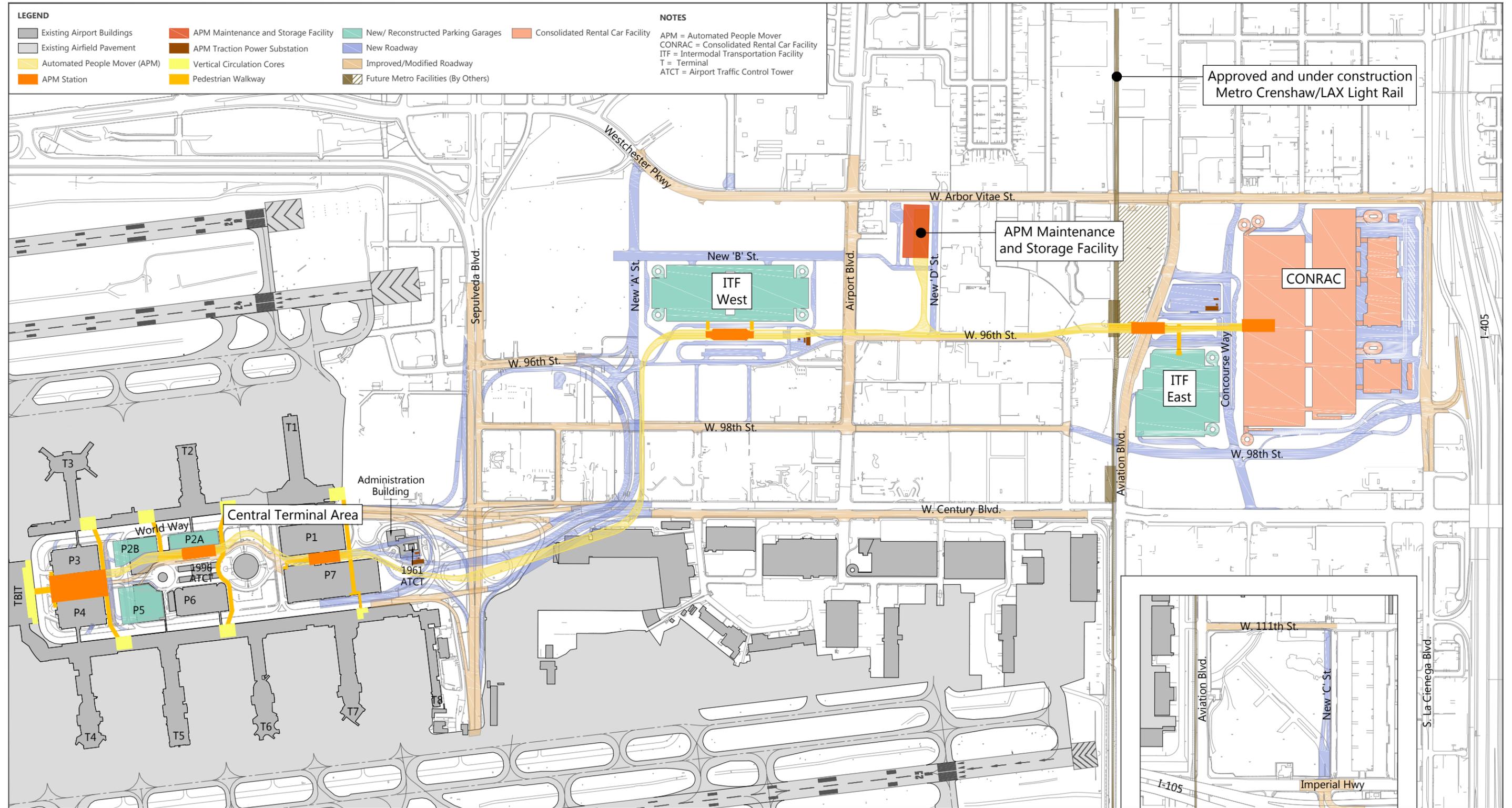
2. PREVIOUSLY APPROVED LAX LANDSIDE ACCESS MODERNIZATION PROGRAM

The LAX Landside Access Modernization Program Project, as described and analyzed in the certified Final EIR, included: 1) construction of an APM system; 2) construction of two ITFs; 3) construction of a Consolidated Rental Car Facility (CONRAC); 4) roadway improvements; (5) utilities that support the LAX Landside Access Modernization Program Project; (6) establishment of transportation policies at LAX; (7) enabling projects to allow for construction of the LAX Landside Access Modernization Program; and (8) development of design and sustainability guidelines. The LAX Landside Access Modernization Program Project components as identified and analyzed in the LAX Landside Access Modernization Program EIR are shown in **Figure 1**.

- **Automated People Mover.** The APM system is the primary component of the approved Project. The APM is designed to provide reliable, time-certain access to the CTA for passengers, employees, and other users. The APM will be a fully automated, grade-separated train system, consisting of an elevated dual-lane guideway with six stations; three located within the CTA and three outside of the CTA. The APM system also includes an MSF, as well as the construction of up to four traction power substations (TPSSs) to provide power to the APM guideway and trains.
- **Intermodal Transportation Facilities.** The approved Project includes two ITFs: an ITF West and an ITF East, as shown on Figure 1. The ITFs will provide convenient locations outside of the CTA for passenger pick-up and drop-off by private vehicles, limousines, taxis, transportation network companies (e.g., Uber and Lyft), and other commercial vehicles or for passengers and employees to park and take the APM to the CTA, which will reduce traffic on the Airport entrance roads and within the CTA.
- **Consolidated Rental Car Facility.** The CONRAC will provide a centralized location for rental car agencies serving LAX. A CONRAC is a facility or complex that hosts multiple rental car agencies in one location. It typically provides facilities for customers to complete rental car contract paperwork, pick-up and drop-off their vehicles, and for the rental car companies to stage, store, and service the vehicles in preparation for renting them to the next customer. The CONRAC will be located south of W. Arbor Vitae Street, west of S. La Cienega Boulevard (and just west of I-405), north of the extended W. 98th Street, and east of the extended Concourse Way. The CONRAC will also be located just east of the ITF East and the future Metro AMC 96th Street Transit Station.
- **Roadway Improvements.** Improvements to roadways serving the CTA and the new ITFs and CONRAC are an important component of the approved Project. Improvements will include, among others, new roadway segments, additional lanes, realignment of segments of some existing roads, restriping, new or realigned driveways, roadway closures, streetscape improvements, landscaping, and intersection improvements.
- **Utilities.** Utility improvements are required to support the operations of the approved Project facilities. In addition, the relocation of existing utility lines affected by construction of the approved Project will also be

required. The approved Project will include new buildings and facilities generally located to the east of the CTA, requiring new utility connections for their operations. Such connections may require some level of new infrastructure within the adjacent roadways, depending on the quantity and quality of existing service. Each of the buildings will require new and/or upgraded reclaimed water, power, storm and wastewater drains, natural gas, communications, and other related utility services.

- **Transportation Policy Changes.** In addition to the approved Project components described above, LAWA will establish policy changes to fees, pricing, licenses, traffic patterns, and agreements with various commercial vehicle operators at LAX, as well as fees and prices for parking at LAX facilities as part of the approved Project. Additionally, LAWA may implement tolls for commercial vehicle operators and potentially to the public to access Airport facilities if needed to manage traffic during peak periods and for incident management. During construction, a variety of strategies were identified to alleviate roadway and curbside congestion, including encouraging use of the Departures level during the Arrivals level peak, making use of kiss-and-ride, remote passenger pick-up, and restricting vehicle recirculation within the CTA.
- **Enabling Projects.** The approved Project will require a series of enabling projects to allow for construction, including utility relocation and demolition of certain existing facilities, some of which will be reconstructed. Additionally, acquisition of approximately 49 properties and 21 billboards located along the proposed APM and roadway alignments will be required, including residential properties within the Belford and Manchester Square areas. Additionally, roadway improvements will require the construction of new driveways, curb cuts, and ramps, which will also require easements or property acquisition.
- **Design and Sustainability Guidelines.** LAWA has developed a set of design and sustainability guidelines to be incorporated into the design, construction, and operations of each approved Project component. The design guidelines establish LAWA's comprehensive vision for the passenger experience at LAX. They are intended to integrate the design of new and existing facilities and to create an improved passenger experience. The sustainability guidelines serve as a mechanism to promote LAWA's commitment to reduce its environmental footprint and promote energy efficient design requirements; water conservation and water quality improvement projects; natural resource protection efforts; waste reduction and recycling; and numerous air quality emissions reduction policies and programs. LAWA requires that all Airport building projects with a City of Los Angeles Department of Building and Safety (LADBS) permit-valuation over \$200,000 shall achieve Los Angeles Green Building Code (LAGBC) Tier 1 conformance.



NOTE: Improvements depicted are conceptual only and do not represent engineered design.
 SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016; Ricondo & Associates, Inc., September 2018.



FIGURE 1

LAX Landside Access Modernization Program Components

3. PROJECT CHANGES ADDRESSED IN THIS ADDENDUM

Since certification of the Final EIR, components of the LAX Landside Access Modernization Program Project have been refined. LAWA is proposing the following changes (proposed refinements) to the previously approved Project: the inclusion of up to four backup power generators for the APM; the addition of three emergency access point locations for the APM, a potential additional crossover switch between the East CTA APM Station and the ITF West APM Station, and minor modifications to the APM guideway in this area to preserve the option for a potential future APM station; additional billboard and parcel acquisition; relocation of the existing SBO to the ITF West; and merger of an alleyway east of the APM MSF and modification of Vesting Tract Map VTTM 73422. Also, due to an extended acquisition process, LAWA is considering beginning construction within the Manchester Square area prior to the relocation of the remaining two residential buildings and the Stella Middle Charter Academy/Bright Star Secondary Charter Academy.

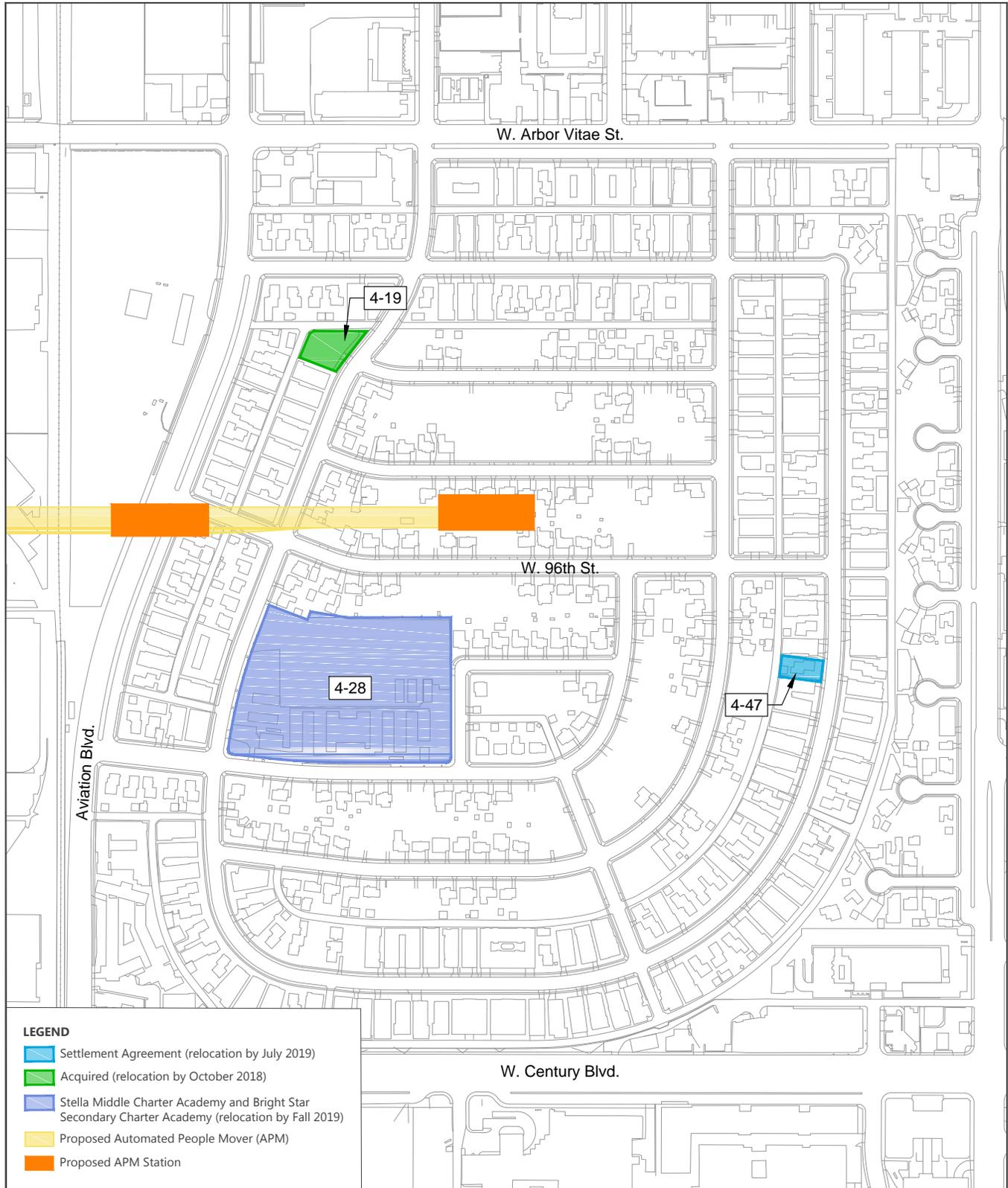
The proposed refinements would affect the construction period and operations of Phase 1 (2024) and Phase 2 (2035) of the approved Project. The proposed refinements would not affect the potential future related development described in EIR Section 2.7.

3.1 MANCHESTER SQUARE PROPERTY RELOCATION

Components of the LAX Landside Access Modernization Program, including the CONRAC, ITF East, and portions of the APM, will be constructed in the area known as Manchester Square, which is bounded by S. La Cienega Boulevard on the east, W. Century Boulevard on the south, Aviation Boulevard on the west, and W. Arbor Vitae Street on the north. LAWA has been purchasing residential properties in Manchester Square as part of the *Los Angeles World Airports Relocation Plan: Manchester Square and the Belford Area*—also known as the existing Aircraft Noise Mitigation Program (ANMP) Relocation Plan for the Belford and Manchester Square areas.² The LAX Landside Access Modernization Program Draft EIR Section 2.5.20 explained that “it is LAWA’s goal that the two charter schools would be closed and relocated prior to Project construction. However, LAWA may need to construct some of the APM guideway columns west of the schools and east of Aviation Boulevard prior to the school relocation.” While LAWA has reached agreement on the acquisition of the last two parcels, relocation of the existing residential tenants may not occur until October 2018 for one of the residential parcels or until July 2019 for the other residential parcel. The schools have agreed to relocate by September 1, 2019.

The relocation status of the remaining three parcels in Manchester Square are shown on **Figure 2** and listed on **Table 1**. In order for the APM and CONRAC to be operational by 2024, some initial construction activities such as clearing, site preparation, utility work, and possibly foundation work within the Manchester Square area would need to occur prior to September 2019.

² As of 2016, when LAWA was preparing the LAX Landside Access Modernization Program EIR, the Belford and Manchester Square areas respectively contained 1 and 37 remaining residential parcels, for a total of 38 residential parcels that had not been acquired as part of the existing ANMP Relocation Plan.



SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016; LAWA December 13, 2017; Ricondo & Associates, Inc., September 2018.

FIGURE 2

Manchester Square Property Acquisition Status



0 400 ft.

Drawing: P:\Project-Denver\LAX\LAMP\05 - AutoCAD\LAMP_EIR Addendum_Manchester Sq Prop Acquisition Status_20180806.dwg; Layout: Manchester Sq Prop Acq Status Plotted: Sep 7, 2018, 10:30AM

TABLE 1: MANCHESTER SQUARE PROPERTY ACQUISITION STATUS

PARCEL ID	ADDRESS	ACQUISITION STATUS
4-19	9329 Isis Ave, Los Angeles, CA 90045	Relocation by October 2018
4-28	5431 W. 98 th Street (Stella Middle Charter Academy/Bright Star Secondary)	Relocation by September 2019
4-47	9627 Glasgow Pl, Los Angeles, CA 90045	Settlement Agreement – to be vacated by July 2019

SOURCE: Los Angeles World Airports, December 13, 2017.

3.2 APM BACKUP POWER GENERATORS

The EIR analyzed an APM Operating System, which consisted of integration of various subsystems (vehicles, automated train control, power distribution, APM power substations, guidance, propulsion, etc.) to create a fully functional automated and driverless system. The main components of the operating system include the APM cars, the power distribution system, the automated train control system, communication facilities, and other miscellaneous equipment necessary for the proper operation and maintenance of the system. (EIR Section 2.4.1.1 and Table 2-1).

Since the Final EIR was certified, LAWA has selected an APM developer, and technical provisions of the APM system have been further refined to include emergency power systems for use during failure management situations. The APM system has been designed to maintain a minimum of 50 percent available line capacity for any single point failure for a period of at least 40 minutes. To provide emergency power, alternative emergency power shall be derived from energy storage devices (such as batteries) except at the West CTA APM Station and APM MSF where a combination of energy storage devices and diesel generators would be used. Diesel generators may be used for fire/life-safety functions only. The APM developer currently plans for the installation of two backup generators, one rated at up to 1,200 kilowatts (kW) at the West CTA APM Station, and one rated at 500 kW at the APM MSF. At the time the analysis for this Addendum was conducted, the APM developer had not been selected and it was assumed that up to four backup generators, each rated at 3,000 kilowatts (kW), would be located in the vicinity of each TPSS station, and one at the APM MSF (see Figure 1). To be conservative, and because the technology utilized to meet the emergency backup requirements could change, the evaluation of the backup power system in this Addendum assumed four 3,000-kW generators. Any fuel tanks associated with the generators would be located outside of the buildings at their respective locations.

In the event of the loss of power from the Los Angeles Department of Water and Power (LADWP), the emergency systems would provide power to operate the APM system for a period of time sufficient for every normally scheduled train to complete its scheduled trip to the end of line station to discharge passengers, and then to be removed from service and stored at the APM MSF. The time from the request for generator power to full availability of emergency power shall not exceed one hundred and twenty (120) seconds. Once the emergency power system is on-line, it shall also power all escalators and 50 percent of the elevators in the APM stations and any other station loads required to ensure Americans with Disabilities Act (ADA) compliance for a minimum of 40 minutes. Operations of the generators would be for backup purposes only but would be occasionally run for testing and maintenance.

3.3 APM EMERGENCY ACCESS POINTS AND MINOR MODIFICATIONS TO APM GUIDEWAY

The Final EIR identified that the height of the elevated guideway could pose accessibility constraints depending on the location of the incident, and subsequently affect response times. The Final EIR identified that the Los Angeles

Fire Department (LAFD) would access the APM with a 100-foot ladder from Fire Station 95; however, it also noted that access may be difficult due to variations in elevation, topography, and the street network operating underneath the guideway. The APM guideway, as proposed in the Final EIR, and in compliance with California Public Utility Commission (CPUC) requirements, would have an emergency walkway along the entire guideway to provide egress for passengers in the event of an emergency as well as access for emergency personnel. (EIR p. 4.11-24).

Subsequent to the certification of the Final EIR, the LAFD has requested additional emergency access point locations be placed along the proposed APM alignment to increase accessibility in areas with long distances between APM stations. Two of the emergency access points would consist of a single secured open staircase with a footprint of up to 12 feet by 25 feet and would be accessed from ground level (Emergency Access Locations 1 and 3). The third access point (Emergency Access Location 2) is planned to be accessed via ladder truck. The proposed emergency access point locations identified in **Figure 3** indicates general location and configuration, as the developer will select the final site locations within the zone limits provided. **Table 2** identifies the distance between the APM platforms included in the certified Final EIR and the additional emergency access points.

The Final EIR further explained that the dual-lane guideway would be equipped with switching locations to support the APM operation. (EIR p. 2-33). LAWA has identified the potential need for another crossover switch, which allows trains to switch from one track to another in case of a disabled train, between the East CTA APM Station and the ITF West APM Station (see Figure 3). In order to accomplish this, LAWA may split the tracks and add a switch platform in the area of Emergency Access Location 1 (i.e., east of Sepulveda Boulevard). Preliminary consideration has been given to a potential additional station in this same location.³ To preserve the option for a potential additional station without major future disruptions to the APM, it is necessary to develop four (4) additional columns, expansion joints, and modifications to the emergency walkway structure in this area. These modifications would be incorporated into the emergency access point and crossover switch identified for this portion of the APM guideway.

TABLE 2: APM PLATFORM DISTANCES ¹

	EAST CTA APM STATION	EMERGENCY ACCESS LOCATION 1	EMERGENCY ACCESS LOCATION 2	ITF WEST STATION	EMERGENCY ACCESS LOCATION 3	ITF EAST STATION
East CTA APM Station	---	1,855 feet	3,440 feet	4,860 feet	6,465 feet	8,335 feet
Emergency Access Location 1	1,855 feet	---	1,585 feet	3,005 feet	4,610 feet	6,480 feet
Emergency Access Location 2	3,440 feet	1,585 feet	---	1,420 feet	3,025 feet	4,895 feet
ITF West Station	4,860 feet	3,005 feet	1,420 feet	---	1,605 feet	3,475 feet
Emergency Access Location 3	6,465 feet	4,610 feet	3,025 feet	1,605 feet	---	1,870 feet
ITF East Station	8,335 feet	6,480 feet	4,895 feet	3,475 feet	1,870 feet	---

NOTES:

--- = not applicable

¹ All distance measurements are approximate and are measured from the center of platform to center of platform.

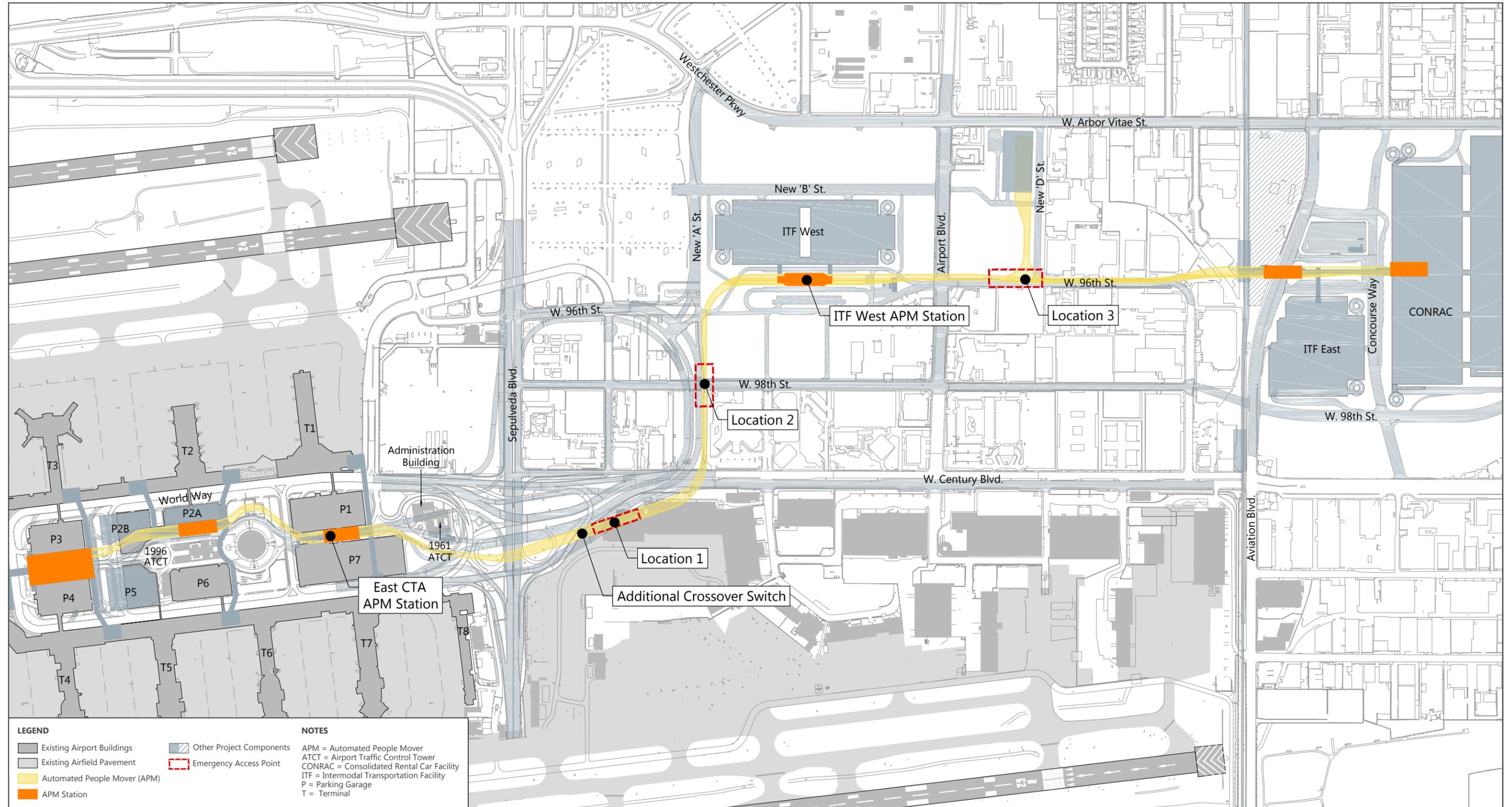
CTA = Central Terminal Area

APM = Automated People Mover

ITF = Intermodal Transportation Facility

SOURCE: Ricondo & Associates, Inc., May 2018.

³ If the guideway was constructed as currently designed and LAWA later decided to build an additional station, extensive changes would be required to the guideway to support the additional station. Deferring this work to a later date would negatively impact APM schedule, cost, and, ultimately, the service availability date which the APM developer is obligated to meet under its agreement with LAWA.



NOTE: Improvements depicted are conceptual only and do not represent engineered design.
 SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016; Ricondo & Associates, Inc., September 2018.



FIGURE 3

Automated People Mover (APM)
 Emergency Access Point and Additional Crossover Switch Locations

3.4 PARCEL AND BILLBOARD ACQUISITION

As identified in the certified Final EIR, the approved roadway improvements will require easements and property/billboard acquisition for the construction of new driveways, curb cuts, and ramps. (EIR Section 2.5.18).

Since certification of the LAX Landside Access Modernization Program Final EIR, additional parcels and billboards have been identified for acquisition, as identified in **Table 3**. This includes uneconomical remnants or landlocked parcels created by the approved Project, which LAWA is likely required to acquire under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (codified as amended at 42 U.S.C. 4601-4655) and California Government Code §7260. Also included on this list are areas for additional curb cuts and properties owned by, or being acquired by Metro, where easements for the APM columns are required. LAWA continues to negotiate with Metro for acquisition of the necessary easements. LAWA would utilize easement and partial takes to the extent feasible, to minimize any acquisition required.

TABLE 3: ADDITIONAL PROPERTIES TO BE ACQUIRED

PROPERTY ADDRESS	PRIMARY BUSINESS	LOT AREA (ACRES)	ZONING	APN
6155 W. 98th St., Los Angeles, CA 90045	N/A	1.00	LAX	4124027029
Remnant parcel located at the 9900 block of Aviation Boulevard	N/A	0.01	M2-1	4125026801
9800 S. La Cienega Blvd., Los Angeles, CA 90045	N/A	0.63	M2-1	4128026015
5730 W. Arbor Vitae St., Los Angeles, CA 90045	N/A	2.34	M2-1	4125020901
5740 W. Arbor Vitae St., Los Angeles, CA 90045	N/A	1.56	M2-1	4125020905
5630 W. Arbor Vitae St., Los Angeles, CA 90045	N/A	0.33	M2-1	4125020906
5600 W. Arbor Vitae St., Los Angeles, CA 90045	N/A	0.07	M1-1	4125026900
9432 Bellanca Ave., Los Angeles, CA 90045	N/A	1.61	M2-1	4125021903
"U" Bellanca Ave., Los Angeles, CA 90045	N/A	0.27	M2-1	4125021900
744 S. Glasgow Ave., Inglewood, CA 90301	N/A	0.70	N/A	4126011055
5447 W. Century Blvd., Los Angeles, CA 90045 ¹	N/A	N/A	N/A	4128024902
5447 W. Century Blvd., Los Angeles, CA 90045 ¹	N/A	N/A	N/A	4128024902
5994 W. 96th St., Los Angeles, CA 90045 ¹	N/A	N/A	N/A	4125010015
9717 S. Airport Blvd., Los Angeles, CA 90045 ¹	N/A	N/A	N/A	4124029040
9775 Airport Blvd., Los Angeles, CA 90045 ¹	N/A	N/A	N/A	4124029026
5563 W Arbor Vitae St., Los Angeles, CA 90045 ¹	N/A	N/A	N/A	4128002015

NOTES:

N/A = data not available

¹ Billboard

SOURCE: City GIS Data, 2018.

3.5 SECURITY BADGE OFFICE RELOCATION

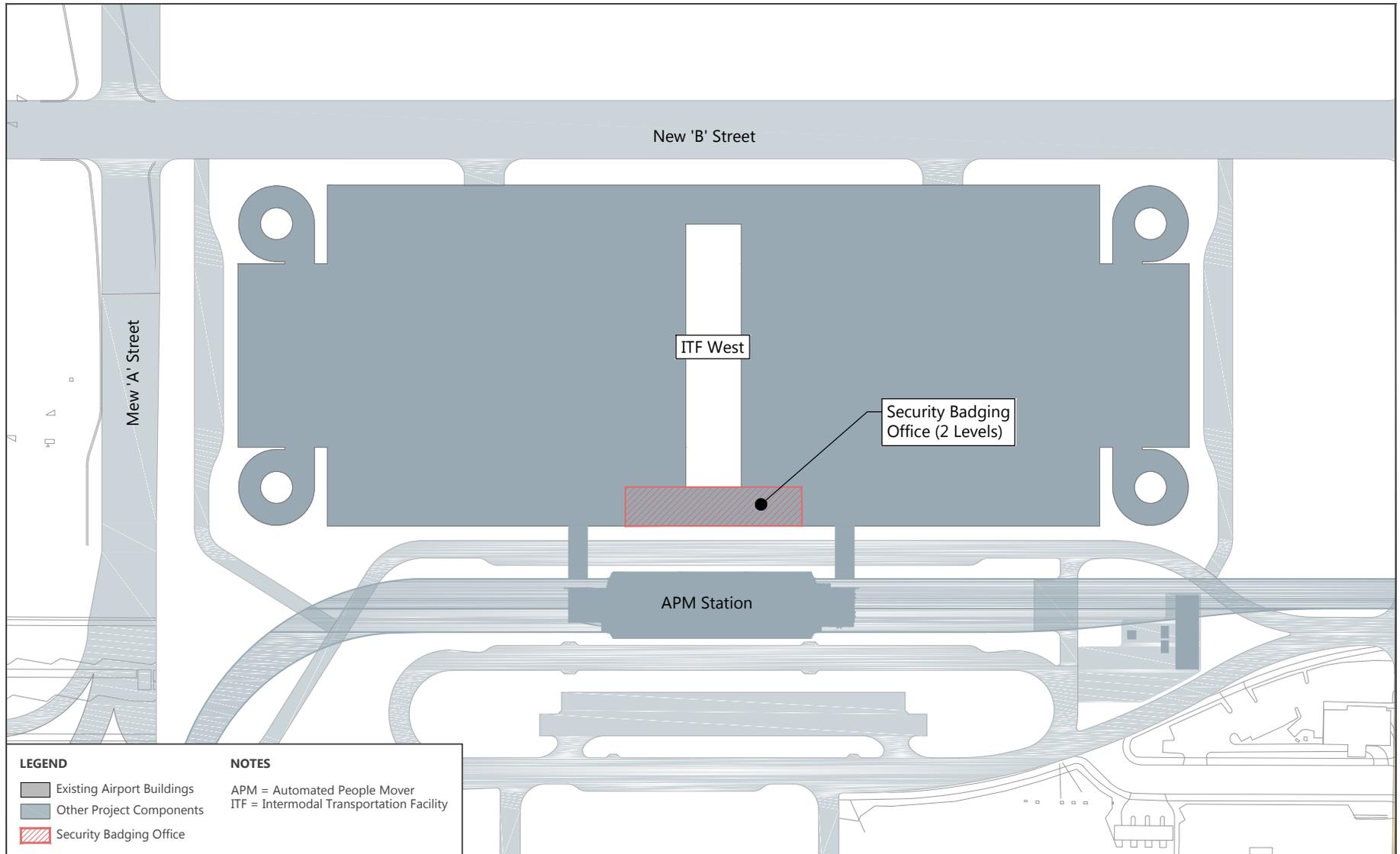
The existing SBO occupies approximately 25,000 square feet of a building on the west side of the Airport at 7333 World Way West. This location is inconvenient for the majority of Airport workers, who work within the CTA. Employees working in the CTA must take a shuttle to the employee parking lot, drive to the west side of the Airport, visit the SBO, drive back to the employee parking lot, then take a shuttle back to the CTA. Bus service to the west

side of the Airport is limited, also making it difficult and time consuming for employees to utilize mass transit to get to the SBO. To improve the operational efficiency and convenience of the SBO, LAWA has determined that the SBO needs to be located adjacent to the APM, as it is at similar, large-hub U.S. airports. The LAMP EIR did not include any analysis of relocating the existing LAWA SBO. However, since certification of the Final EIR, LAWA is now proposing to relocate the existing SBO facility to the ITF West. The new SBO would consist of approximately 25,000 square feet of floor space, incorporated into the first and second levels of the previously approved ITF West Garage core structure. The new SBO would not change the size of the previously approved ITF West. **Figure 4** depicts the ITF West and proposed SBO location. The facility would contain similar size spaces as the existing SBO, for administrative functions, waiting rooms, and badge processing. There are no current plans for the existing SBO space.

3.6 ALLEYWAY MERGER

The Final EIR, Figure 2-42, provides an overview of the proposed roadway improvements east of the CTA. This includes new "D" Street, new "B" Street, and a new roadway to access the APM MSF. EIR Section 1.1.4 further noted that the LAX Landside Access Modernization Program would require vacations of public rights-of-way.

Consistent with the Final EIR, an approximately 1,120-foot alleyway, located parallel to and approximately 160 feet east of Belford Avenue, and east of the approved APM MSF, would be merged into the approved 'D' Street, as shown in **Figure 5**. Merger of the alleyway has been coordinated with the adjacent property owner. Access to the adjacent property would be provided via 'D' Street. LAWA would modify Vesting Tract Map VTTM 73422, part of the entitlements approved in the EIR, to depict the merger.

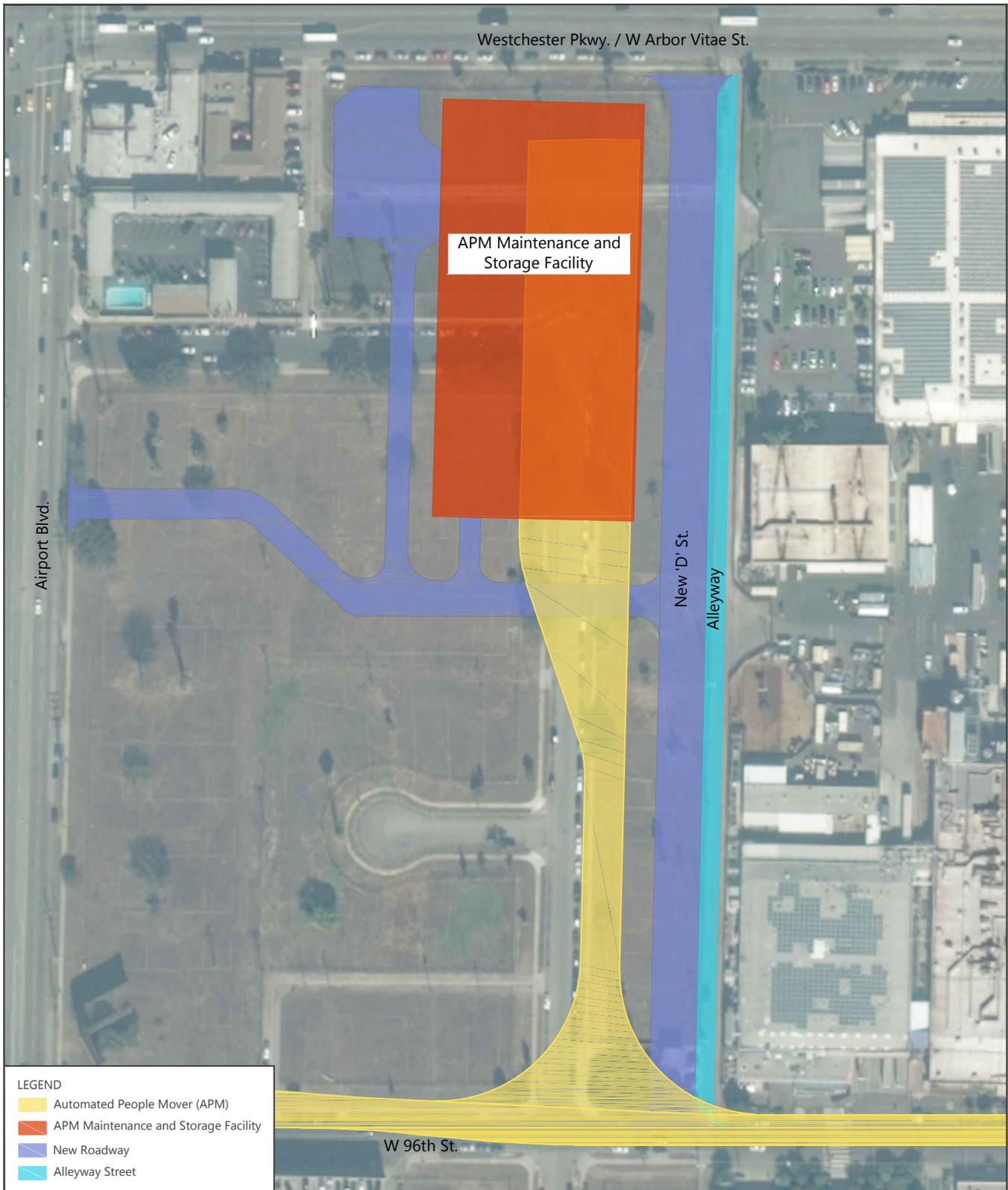


NOTE: Improvements depicted are conceptual only and do not represent engineered design.
 SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016; Ricondo & Associates, Inc., September 2018.

FIGURE 4

ITF West
 Proposed Security Badging Office





SOURCE: Los Angeles World Airports, August 2016 (aerial imagery for visual reference only - may not be to scale); Ricondo & Associates, Inc., September 2018.

FIGURE 5



Alleyway Street Vacation

Drawing: P:\Project-Denver\LAX\LAMP\05 - AutoCAD\LAMP_EIR Addendum_Alleyway_20180907.dwgLayout: Fig 5 - Alleyway Plotted: Sep 7, 2018, 10:02AM

4. REQUIREMENTS FOR USE OF AN ADDENDUM

Public Resources Code Section 21166 and Section 15162 of the State CEQA Guidelines identifies the circumstances that necessitate the preparation of a subsequent EIR. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known, with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) *The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;*
 - (B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - (C) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (D) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Pursuant to Section 15164 of the State CEQA Guidelines, if some changes or additions to a previously certified EIR are necessary but none of the above conditions have occurred, the lead agency (in this case LAWA) may prepare an Addendum to document why no further environmental review is required. An addendum need not be circulated for public review, but can be included in or attached to the Final EIR, which the decision-making body shall consider prior to making a decision on the project. A brief explanation supported by substantial evidence of why an agency decided not to prepare a subsequent EIR under section 15162 should also be included in the addendum, the findings on the project, or somewhere in the record. This explanation is included in this Addendum.

5. EVALUATION OF ENVIRONMENTAL IMPACTS

In performing the required analysis pursuant to CEQA and determining that the criteria are met for use of an addendum, this Addendum compares impacts of the proposed refinements to impacts of the Project as previously approved and analyzed in the certified Final EIR. For purposes of determining whether the proposed refinements trigger the need to prepare a subsequent EIR pursuant to State CEQA Guidelines Section 15162, this Addendum relies on the evaluation of the environmental resources/issues below and summarizes the responses to whether any of the criteria presented in Section 4 have been met. Section 6 contains the discussion/analysis relative to cumulative impacts. Justification for the appropriateness of an addendum is provided in Section 7. Finally, the conclusion associated with the analysis of the Addendum is provided in Section 8.

5.1 SUMMARY OF ENVIRONMENTAL TOPICS/RESOURCE AREAS THAT WOULD NOT BE AFFECTED BY THE PROPOSED REFINEMENTS

The Notice of Preparation/Initial Study (NOP/IS) for the approved Project (refer to Appendix A of the LAX Landside Access Modernization Program Draft EIR) and the certified Final EIR determined that implementation of the approved Project would have no impact, a less than significant impact, or a less than significant impact after mitigation for a number of environmental topics/resource areas. As with the approved Project, the proposed refinements would not have impacts related to agricultural and forestry resources, geology/soils, mineral resources, and recreation. As with the approved Project, impacts of the proposed refinements would continue to be less than significant for aesthetics (shading, light and glare); biological resources; cultural resources (archaeological resources, paleontological resources, human remains); greenhouse gas emissions; hazards and hazardous materials; hydrology, water quality, and groundwater; land use and planning; noise and vibration (road traffic and transit); population and housing; public services (fire protection and law enforcement); and utilities and service systems. Additionally, there were several environmental topics/resource areas that were found to have significant and unavoidable impacts in the certified Final EIR but would not be affected by the proposed refinements, including: aesthetics (visual character); cultural resources (historic resources); greenhouse gas emissions (plan/policy consistency); transportation/traffic (on-Airport traffic and construction traffic); and public services (schools).⁴

Determination: *No Changes or New Information Requiring Preparation of a Subsequent EIR*

Conclusion Regarding Applicability of State CEQA Guidelines Section 15162:

As indicated above and in Section 5.2 below, the proposed refinements to the Project would not result in any new or substantially increased impacts or changes in circumstances or information identified in the certified LAX Landside Access Modernization Program Final EIR for all environmental topics, including but not limited to aesthetics, agricultural and forestry resources, air quality and human health risk, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems. Therefore, the impacts to these environmental topics/resources as a result of the proposed refinements to the Project would not trigger any of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR.

⁴ As discussed in Section 3, the proposed refinements to the approved Project would not affect the future potential related development.

5.2 EVALUATION OF ENVIRONMENTAL TOPICS/RESOURCE AREAS THAT WOULD BE AFFECTED BY THE PROPOSED REFINEMENTS BUT WOULD NOT RESULT IN ANY NEW SIGNIFICANT OR SUBSTANTIALLY MORE SEVERE IMPACTS

5.2.1 AIR QUALITY AND HUMAN HEALTH RISK

The air quality and human health risk analyses for the LAX Landside Access Modernization Program is detailed in Section 4.2 of the LAX Landside Access Modernization Program EIR.

5.2.1.1 ANALYSIS

Construction

Peak daily construction-related emissions for the approved Project were calculated from a peak-month average day for each month of each year of construction. As shown in Table 4.2.1-7 of the LAX Landside Access Modernization Program EIR, maximum Project construction emissions for the approved Project were projected to be lower than the South Coast Air Quality Management District (SCAQMD) CEQA construction emission thresholds for carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM₁₀), and particulate matter with a diameter less than or equal to 2.5 micrometers (PM_{2.5}). Maximum Project construction emissions (without mitigation) would exceed the thresholds for nitrogen oxides (NO_x) and volatile organic compounds (VOCs). Therefore, the EIR determined that the approved Project's construction emissions of NO_x and VOCs would be significant. In addition, the local effects from the on-site portion of construction emissions were evaluated at nearby sensitive receptor locations that could be affected by the approved Project. As summarized in Table 4.2.1-8 of the LAX Landside Access Modernization Program EIR, the unmitigated Project peak construction concentrations would be less than the SCAQMD CEQA ambient air quality standards for all criteria pollutants except for the 24-hour and annual PM₁₀ thresholds and the 1-hour nitrogen dioxide (NO₂) National Ambient Air Quality Standards (NAAQS). Therefore, the EIR determined that the localized construction impacts of the approved Project relative to NO₂ and PM₁₀ concentrations would be significant.

The EIR identified one Standard Control Measure (Mitigation Measure) LAX-AQ-1 - Construction-Related Air Quality Control Measures, and one project-specific Mitigation Measure, MM-AQ (LAMP)-1 – Preferential Use of Renewable Diesel Fuel, to address construction-related emissions associated with the approved Project. Implementation of the measures would result in substantial emission reductions compared to fleet-wide average emissions for heavy-duty construction equipment and trucks in the southern California region. Although the inclusion of the measures would reduce the project construction-related emissions, project-related regional emissions of NO_x and VOCs would remain significant, as well as local annual concentrations of PM₁₀. However, the EIR determined that the mitigated localized construction effects would be less than significant for NO₂ and 24-hour PM₁₀.

As detailed in Section 4.2.2 of the LAX Landside Access Modernization Program EIR (beginning on page 4.2-69 of the EIR), human health impacts (i.e., incremental cancer risks) associated with construction of the approved Project were found to be less than significant with the aforementioned mitigation measures.⁵

⁵ Incremental chronic and acute *non-cancer* health hazards associated with construction of the approved Project were found to be less than significant even without implementation of Standard Control Measure (Mitigation Measure) LAX-AQ-1 - Construction-Related Air Quality Control Measures, and Mitigation Measure, MM-AQ (LAMP)-1 – Preferential Use of Renewable Diesel Fuel.

The proposed refinements to the approved Project would not result in a significant change to the maximum Project construction emissions. However, the potential construction in Manchester Square (the initiation of construction at Manchester Square prior to relocation of all residences and the schools) could affect the localized emissions concentrations and the associated human health risk assessment for residents, workers, and school children. Because the acquisition of two residential properties and the two schools has taken longer than anticipated, resident and school children receptors would be present during initial construction activities such as clearing, site preparation, utility work, APM guideway columns, and possibly foundation work. Air quality and human health risk analysis associated with the proposed refinements, including the construction in Manchester Square, can be found in **Appendix A**. As documented in Appendix A, incremental cancer risks and incremental chronic and acute non-cancer health hazards for the proposed refinements were found to be below the thresholds of significance for all receptors during the construction period.

Operations

Operationally, the approved Project would improve the local transportation system, eliminate most rental car shuttles, and result in more passengers and Airport-related employees accessing the Airport via transit. The primary sources of operational emissions are the vehicles traveling to and from the Airport, including those accessing the various Project elements. The operational air quality analysis included in the LAX Landside Access Modernization Program EIR compared emissions from the 2024 With and Without the approved Project, and 2035 With and Without the approved Project. As shown in Tables 4.2.1-10 and 4.2.1-11 of the LAX Landside Access Modernization Program EIR, implementation of the Project would decrease regional operational emissions for all criterial pollutants when compared to future conditions without the approved Project. Therefore, the approved Project's regional operational emissions in 2024 and 2035 would be less than significant when compared to future conditions without the Project. In addition, the local effects from operational emissions were evaluated at nearby sensitive receptor locations that could be affected by the approved Project. Tables 4.2.1-14 and 4.2.1-15 of the LAX Landside Access Modernization Program EIR compare the incremental increase in peak concentrations in pollutants for the 2024 Future With Project scenario to the 2024 Future Without Project scenario, and the 2035 Future With Project scenario to the 2035 Future Without Project scenario, respectively. The Project-related incremental changes in pollutant concentrations for the 2024 Future With Project scenario would not exceed local operational-based thresholds and, therefore, the approved Project would not result in a significant impact; however, the Project-related incremental changes in pollutant concentrations for the 2035 Future With Project scenario would exceed local operational thresholds for annual PM₁₀. Therefore, the approved Project's operational annual concentrations of PM₁₀ would result in a significant impact compared to future conditions without the approved Project.

The EIR identified two Standard Control Measures (Mitigation Measures), Standard Control Measures (Mitigation Measures) LAX-AQ-2 - Transportation-Related Air Quality Control Measures, and LAX-AQ-3 - Operations-Related Air Quality Control Measure, and one project-specific Mitigation Measure, MM-GHG (LAMP)-1 – Incorporate Solar Energy into Landside Access Modernization Program Facilities, to address operational emissions associated with the approved Project. Although the inclusion of the measures would reduce operational-related emissions, localized annual PM₁₀ impacts in 2035 would remain significant and unavoidable.

Two of the proposed refinements that could affect air quality and the human health risk analysis include: 1) testing and maintenance of the proposed APM backup generators for up to 1-hour per week; and 2) the emissions related to the changes in vehicle miles traveled (VMT) from the relocation of the LAX SBO. Assumptions, methodologies, and detailed results for these analyses are provided in Appendix A of this Addendum. None of the other proposed refinements would affect the operational emissions analysis.

As stated in Section 3.2 of this Addendum, at the time the analysis for this Addendum was conducted, the APM developer had not been selected and it was assumed that up to four backup generators, each rated at 3,000 kilowatts (kW), would be located in the vicinity of each TPSS station, and one at the APM MSF (see Figure 1). Analysis of the proposed backup generators assumed weekly, one-hour tests would be conducted for each of the four generators. As identified in the EIR, a significant air quality impact would occur if the estimated incremental increase in operations-related emissions attributable to the Project would be greater than the daily emissions thresholds. Operational emissions comparisons are shown in **Table 4**; localized operational concentrations comparisons are shown in **Table 5** and **Table 6** for 2024 and 2035, respectively. As shown, the additional emissions associated with weekly generator testing, when added to total Project emissions, would not change any significance determination presented in the EIR regarding regional or local operations emissions or concentrations. Operations of the generators were also analyzed for potential to increase human health risk in the area. As documented in Appendix A of this Addendum, incremental cancer risks and incremental chronic and acute non-cancer health hazards for the backup generators, when added to total Project emissions, were found to be below the thresholds of significance for all receptors for future operational years.

TABLE 4: APPROVED PROJECT AND PROPOSED BACKUP GENERATOR OPERATIONAL EMISSIONS (2024 AND 2035)

POLLUTANT	2024 (LBS/DAY)			2035 (LBS/DAY)			SIGNIFICANCE THRESHOLD (LBS/DAY)	SIGNIFICANT?
	EIR INCREMENTAL CHANGE ¹	BACKUP GENERATORS ²	TOTAL INCREMENTAL CHANGE	EIR INCREMENTAL CHANGE ³	BACKUP GENERATORS ²	TOTAL INCREMENTAL CHANGE		
NO _x	-7	19	12	0	19	19	55	No
VOC	-3	- ⁴	-3	-1	- ⁴	-1	55	No
PM ₁₀	-33	1	-32	-95	1	-94	150	No
PM _{2.5}	-9	1	-8	-27	1	-26	55	No
SO ₂	0	2	2	-1	2	1	150	No
CO	-233	9	-224	-371	9	-362	550	No

NOTES:

- As identified in the EIR, in accordance with the South Coast Air Quality Management District's *Air Quality Handbook*, a significant air quality impact would occur if the incremental increase in operations-related emissions attributable to the proposed Project would be greater than the daily emission thresholds. EIR incremental change is the change between the proposed Project operational emissions and the 2024 Future Without Project operational emissions for 2024.
- Assumes that generator testing occurs on the peak day of emissions and that generators are tested on different days.
- EIR incremental change is the change between the proposed Project operational emissions and the 2035 Future Without Project operational emissions for 2035.
- USEPA AP-42 does not establish VOC emission rates for stationary diesel compression-ignition engines.

SOURCE: Appendix A of this EIR Addendum.

TABLE 5: OPERATIONAL CONCENTRATIONS – 2024 FUTURE WITH PROJECT AND BACKUP GENERATORS COMPARED TO 2024 FUTURE WITHOUT PROJECT

POLLUTANT	AVERAGING PERIOD ¹	TOTAL (FROM FINAL EIR) ² (µg/m ³)	GENERATOR INCREMENT ³ (µg/m ³)	TOTAL INCLUDING GENERATORS (µg/m ³)	THRESHOLD (µg/m ³)	SIGNIFICANT?
CO ₂	1-hr CAAQS	3,620	31	3,651	23,000	No
	8-hr CAAQS	2,803	2	2,805	10,000	No
NO _x	1-hr CAAQS	165	44	209	339	No
	1-hr NAAQS	118	29	147	188	No
	Annual CAAQS	24	<1	24	57	No
SO ₂	1-hr CAAQS	39	4	43	655	No
	1-hr NAAQS	16	3	19	196	No
	3-hr NAAQS	39	4 ⁴	43	1,300	No
	24-hr CAAQS	8	<1	8	105	No
	Annual NAAQS	3	<1	3	80	No
PM ₁₀	24-hr	1.6	0.1	1.7	2.5	No
	Annual	0.7	<0.1	0.7	1.0	No
PM _{2.5}	24-hr	0.9	0.1	1.0	2.5	No

NOTES:

CAAQS = California Ambient Air Quality Standard.

NAAQS = National Ambient Air Quality Standard.

¹NAAQS and CAAQS often have the same averaging period, but usually have different standard values and may have different methods of determining compliance with each standard.

² As identified in the EIR, in accordance with the South Coast Air Quality Management District's *Air Quality Handbook*, a significant air quality impact would occur if the incremental increase in operations-related emissions attributable to the proposed Project would be greater than the daily emission thresholds. Totals from EIR were calculated by adding the Incremental Peak concentration (determined by calculating the differences between Future With Project and Future Without Project scenarios at each receptor, then selecting the maximum value across all receptors) to background concentrations.

³ The receptor of maximum concentration from the backup generators does not necessarily match up with the peak receptor from the Final EIR, therefore exaggerating potential impacts.

⁴ 1-hr CAAQS value used in lieu of 3-hr concentration.

SOURCE: Appendix A of this EIR Addendum.

TABLE 6: OPERATIONAL CONCENTRATIONS – 2035 FUTURE WITH PROJECT AND BACKUP GENERATORS COMPARED TO 2035 FUTURE WITHOUT PROJECT

POLLUTANT	AVERAGING PERIOD ¹	TOTAL (FROM FINAL EIR) ² (µg/m ³)	GENERATOR INCREMENT ³ (µg/m ³)	TOTAL INCLUDING GENERATORS (µg/m ³)	THRESHOLD (µg/m ³)	SIGNIFICANT?
CO ₂	1-hr CAAQS	3,605	31	3,636	23,000	No
	8-hr CAAQS	2,796	2	2,798	10,000	No
NO _x	1-hr CAAQS	176	44	220	339	No
	1-hr NAAQS	126	29	155	188	No
	Annual CAAQS	25	<1	25	57	No
SO ₂	1-hr CAAQS	39	4	43	655	No
	1-hr NAAQS	16	3	19	196	No
	3-hr NAAQS	39	4 ⁴	43	1,300	No
	24-hr CAAQS	8	<1	8	105	No
	Annual NAAQS	3	<1	3	80	No
PM ₁₀	24-hr	2.3	0.1	2.4	2.5	No
	Annual	1.2	<0.1	1.2	1.0	Yes
PM _{2.5}	24-hr	1.0	0.1	1.1	2.5	No

NOTES:

CAAQS = California Ambient Air Quality Standard.

NAAQS = National Ambient Air Quality Standard.

- 1 NAAQS and CAAQS often have the same averaging period, but usually have different standard values and may have different methods of determining compliance with each standard.
- 2 As identified in the EIR, in accordance with the South Coast Air Quality Management District's *Air Quality Handbook*, a significant air quality impact would occur if the incremental increase in operations-related emissions attributable to the proposed Project would be greater than the daily emission thresholds. Totals from EIR were calculated by adding the Incremental Peak concentration (determined by calculating the differences between Future With Project and Future Without Project scenarios at each receptor, then selecting the maximum value across all receptors) to background concentrations.
- 3 The receptor of maximum concentration from the backup generators does not necessarily match up with the peak receptor from the Final EIR, therefore exaggerating potential impacts.
- 4 1-hr CAAQS value used in lieu of 3-hr concentration.

SOURCE: Appendix A of this EIR Addendum.

Analysis of the LAX SBO relocation found that trips within the local traffic system to the existing SBO would be rerouted to a location closer to more of the greater Los Angeles area and with direct access to alternative modes of transportation (i.e. the APM and transit). Therefore, the average trip to the badging office would require less VMT for future operational years. The shortened trip length to the SBO would result in an estimated decrease in overall emissions, resulting in a less than significant impact on operational-related regional air quality. Furthermore, SBO trips account for less than one percent of annual airport-related traffic; this change in origin and/or destination trips for such a small fraction of the total emissions in the local area would have a negligible impact on peak local concentrations of criterial pollutants. Additional analysis on the SBO relocation can be found in Section 5.2.3, *Off-Airport Transportation/Traffic*.

Results of the analyses concluded that the proposed refinements would not result in a significant increase in operational emissions, local operational pollutant concentrations impacts, or human health impacts (i.e., incremental cancer risks and incremental chronic and acute non-cancer health hazards). Therefore, no significant change in

operational air quality or human health is anticipated from the proposed Project refinements in this Addendum. Additionally, operations of the proposed refinements would not require additional mitigation measures or changes to the approved mitigation measures.

5.2.1.2 DETERMINATION

Determination: *No New Significant Environmental Effects or a Substantial Increase in the Severity of Previously Identified Significant Effects Requiring Preparation of a Subsequent EIR*

Conclusions Regarding Applicability of State CEQA Guidelines Section 15162:

The proposed refinements to the approved Project would not substantially increase the severity of previously identified air quality or human health risk impacts, nor would they result in any new significant effects that were not previously identified in the LAX Landside Access Modernization Program EIR. The mitigation measures previously adopted for the approved Project (LAX-AQ-1, LAX-AQ-2, LAX-AQ-3, MM-AQ (LAMP)-1, and MM-GHG (LAMP)-1) would be applied to the construction and operation of the proposed refinements, as applicable, in a manner consistent with those suggested in the EIR. No additional mitigation measures would be required for the proposed refinements. Therefore, the impacts to air quality and human health risk as a result of the proposed refinements to the approved Project would not trigger any of the conditions described in State CEQA Guidelines Section 15162 requiring preparation of a subsequent EIR.

5.2.2 CONSTRUCTION NOISE AND VIBRATION

The noise and vibrations analyses for the LAX Landside Access Modernization Program is detailed in Section 4.9 of the LAX Landside Access Modernization Program EIR.

5.2.2.1 ANALYSIS

Noise

Section 4.9.3 of the LAX Landside Access Modernization Program EIR addresses potential noise impacts associated with construction-related traffic and operation of construction equipment during development of the approved Project. As detailed in Section 4.9.3.5 of the LAX Landside Access Modernization Program EIR, the daily transportation of construction workers and the hauling of materials both on and off the Project site would cause increases in noise levels along study area roadways. However, construction-related trucks would be restricted to designated routes ensuring these vehicles utilize the nearby freeways and major arterials to the maximum extent and minimize use of local roadways. Construction traffic noise would be less than significant because noise increases would be less than the 3 dB(A) $L_{eq(th)}$ threshold.⁶ Construction equipment noise levels were also calculated for noise-sensitive receptor locations. As detailed in Section 4.9.3.5 of the LAX Landside Access Modernization Program EIR, construction of several components of the approved Project would result in increases in the ambient exterior noise levels at noise-sensitive land uses over the CEQA 5 dB(A) threshold, including: ITF West; APM MSF; ITF East;

⁶ Equivalent Continuous Noise Level (L_{eq}): L_{eq} is the sound level, expressed in dBA, of a steady sound that has the same A-weighted sound energy as the time-varying sound over the averaging period. Unlike SEL, L_{eq} is the average sound level for a specified time period (e.g., 24 hours, 8 hours, 1 hour, etc.). L_{eq} is calculated by integrating the sound energy from all noise events over a given time period and applying a factor for the number of events. L_{eq} can be expressed for any time interval; for example, the L_{eq} representing an averaged level over an 8-hour period would be expressed as $L_{eq}(8)$.

demolition of the remaining buildings in Manchester Square; CONRAC and associated roadways; and several new roadway segments resulting in a significant impact.

The EIR identified one Standard Control Measure (Mitigation Measure), LAX-N-1 – Construction-Related Noise Control, and one Project-specific Mitigation Measure, MM-N (LAMP)-1 – Noise Curtains, to reduce construction-related noise impacts to nearby noise-sensitive receptors. Implementation of these measures would reduce impacts to a level that would be less than significant, and the Project's incremental contribution to significant construction equipment noise impacts would be less than cumulatively considerable.

Construction for the proposed refinements would result in no change in the number of construction hauling and employee trips. The LAX Landside Access Modernization Program EIR noise analysis utilized the highest Average Daily Trip (ADT) data during the construction period from the Transportation/Traffic analysis, which is not affected by the refinements analyzed in this Addendum. (EIR p. 4.9-6). Consistent with the EIR, construction-related trucks would be restricted to designated routes ensuring these vehicles utilize the nearby freeways and major arterials to the maximum extent and minimize use of local roadways. No significant change in construction-related traffic would result from the proposed refinements.

Because the acquisition and relocation of two residential properties and the Stella Middle Charter Academy/Bright Star Secondary Charter Academy has taken longer than anticipated, resident and school children receptors would be present during initial construction activities such as clearing, site preparation, utility work, APM guideway columns, and possibly foundation work. Thus, the initial construction activities in Manchester Square would result in a change in the proximity of noise-sensitive land uses to the approved Project components during the construction period. An analysis of construction noise levels at occupied residential and school properties in Manchester Square is provided in **Appendix B** of this Addendum. None of the other proposed refinements would result in a change to construction noise, transit noise, or roadway noise.

Potential construction noise was evaluated from a select number of properties that were still occupied in Manchester Square in September 2017. Subsequent to this date, LAWA has acquired and relocated a majority of those parcels, such that only two residential parcels and the Stella Middle Charter Academy/Bright Star Secondary Charter Academy remain occupied. Ambient noise levels in Manchester Square were measured at the property line of those properties that would be located closest to potential construction activities. Parcels 4-19 and 4-28, which are located closer to the end of Runway 6R-24L, are located within the Community Noise Equivalent Level (CNEL) 65 dBA noise contour and have an existing ambient daytime noise level of approximately 67.6 dBA. Parcel 4-47, which is located further from Runway 6R-24L, has an existing daytime ambient noise level of approximately 61.3 dBA. As shown in **Table 7**, for properties with existing daytime ambient noise levels of 67.6 dBA, construction activities occurring at a distance of 50 feet or greater would not cause a significant noise impact. At distances less than 50 feet, noise mitigation would be required, consistent with the Final EIR. For parcels with existing daytime ambient noise levels of 61.3 dBA, construction activities occurring within a distance of 85 feet would require noise mitigation. The potentially affected properties could be located as close to 25 feet to 55 feet from construction activities. Use of best management practices during construction such as standard exhaust mufflers for all equipment would reduce construction noise levels by approximately 7 dBA. With implementation of the adopted mitigation measure MM-N (LAMP)-1, construction noise levels would not increase ambient noise levels by more than 5 dBA and would be less than significant.

TABLE 7: CONSTRUCTION NOISE LEVELS AT VARYING DISTANCES

APPROXIMATE DISTANCE OF CONSTRUCTION ACTIVITIES TO PROPERTY LINE (FEET)	AMBIENT DAYTIME NOISE LEQ (DBA)	CONSTRUCTION NOISE LEVEL WITHOUT MITIGATION (DBA)	CONSTRUCTION PLUS AMBIENT NOISE LEVEL (DBA)	NOISE INCREASE ABOVE AMBIENT (DBA)	CONSTRUCTION NOISE LEVEL WITH MITIGATION (DBA)	NOISE INCREASE ABOVE AMBIENT WITH MITIGATION (DBA)
25	61.3	71.3	71.7	10.4	49.3	0.3
45	67.6	84.4	84.5	16.8	62.4	1.1
50	67.6	70.4	72.2	4.6	N/A	N/A
55	67.6	56.6	67.9	0.3	N/A	N/A
85	61.3	67.0	68.0	6.7	46.0	0.1
515	61.3	53.9	62.0	0.7	N/A	N/A
530	67.6	42.8	67.6	0.0	N/A	N/A

NOTES:

N/A = Not Applicable

SOURCE: Appendix B of this EIR Addendum.

Vibration

Section 4.9.3 of the LAX Landside Access Modernization Program EIR also addresses potential vibration impacts from construction equipment during development of the approved Project. As detailed in Section 4.9.3.5 of the LAX Landside Access Modernization Program EIR, construction vibration is a localized event and is typically only perceptible to a receptor that is close to the vibration source. As shown in Table 4.9.3-8 of the LAX Landside Access Modernization Program EIR, construction of the approved Project would not exceed Federal Transit Authority (FTA) significance thresholds. As such, the EIR concluded that construction equipment vibration impacts associated with the approved Project would be less than significant.

The initial construction activities in Manchester Square would result in a change in the proximity of vibration-sensitive land uses to the approved Project components during the construction period. Potential construction vibration was evaluated from a select number of properties that were still occupied in Manchester Square in September 2017. Subsequent to this date, LAWA has acquired and relocated a majority of those parcels, such that only two residential parcels and the Stella Middle Charter Academy/Bright Star Secondary Charter Academy remain occupied. None of the other proposed refinements would result in a change to construction equipment vibration or vibration due to APM operations.

An analysis of construction vibration levels at occupied residential and school properties in Manchester Square is provided in Appendix B of this Addendum. With the use of the construction equipment in **Table 8**, potential affected properties, located anywhere between 25 feet to 55 feet from construction activities, would experience some attenuation of ground borne vibration. All of the anticipated equipment shown on Table 8, except for pile drivers, would result in vibrations levels below the FTA vibration significance criterion at any distance. The minimum distance at which pile drivers would not exceed the FTA vibration criterion of 0.20 inches per second peak particle velocity (PPV) would be approximately 97 feet. As such, the use of pile drivers will be limited to areas greater than 100 feet from vibration-sensitive land uses while Manchester Square properties are still occupied. Therefore, construction vibration from the proposed refinements would be less than significant.

TABLE 8: CONSTRUCTION VIBRATION LEVELS ESTIMATES

EQUIPMENT	INCHES PER SECOND PPV AT ADJUSTED DISTANCE				THRESHOLD	SIGNIFICANT? (AT 100 FEET)
	25 FEET	50 FEET	75 FEET	100 FEET		
Backhoe	0.040	0.014	0.008	0.005	0.200	No
Concrete Mixer	0.040	0.014	0.008	0.005	0.200	No
Crane	0.057	0.020	0.011	0.007	0.200	No
Grader	0.025	0.003	0.001	0.001	0.200	No
Forklift	0.020	0.007	0.004	0.003	0.200	No
Pile Driver	1.518	0.537	0.292	0.190	0.200	No
Pump	0.014	0.005	0.003	0.002	0.200	No

SOURCE: Office of Planning and Environment, *Federal Transit Administration, Transit Noise and Vibration Impact Assessment*, FTA-VA-90-1003-06 (May 2006), p. 12-9.

5.2.2.2 DETERMINATION

Determination: *No New Significant Environmental Effects or a Substantial Increase in the Severity of Previously Identified Significant Effects Requiring Preparation of a Subsequent EIR*

Conclusion Regarding Applicability of State CEQA Guidelines Section 15162:

The proposed refinements to the approved Project would not substantially increase the severity of previously identified noise or vibration impacts, nor would they result in any new significant effects that were not previously identified in the LAX Landside Access Modernization Program EIR with incorporation of Standard Control Measure (Mitigation Measure) LAX-N-1 and Mitigation Measure MM-N (LAMP)-1. Additionally, the use of pile drivers would be limited to areas greater than 100 feet from any vibration-sensitive land use while properties within Manchester Square are occupied. The incremental contribution to significant construction equipment noise impacts from the proposed refinements would be less than cumulatively considerable because construction activities would not exceed ambient exterior noise levels by 5 dB(A) at a noise-sensitive use. Therefore, the impacts from noise and vibration as a result of the proposed refinements to the approved Project would not trigger any of the conditions described in State CEQA Guidelines Section 15162 requiring the preparation of a subsequent EIR.

5.2.3 OFF-AIRPORT TRANSPORTATION/TRAFFIC

The off-airport traffic analysis for the LAX Landside Access Modernization Program is detailed in Section 4.12.2 of the LAX Landside Access Modernization Program EIR.

5.2.3.1 ANALYSIS

Section 4.12.2 of the LAX Landside Access Modernization Program EIR provides the analysis of the changes in traffic conditions that would result from the ground access system improvements as a part of the approved Project. The analysis identified potential traffic impacts to a traffic analysis study area⁷ for traffic conditions in 2024 With and Without the approved Project, and in 2035 With and Without the approved Project. Impact significance was

⁷ The traffic analysis study area from the LAX Landside Access Modernization Program EIR includes the Airport and an immediate surrounding area of approximately 75 square miles, with 183 intersections selected for analysis.

determined using significance thresholds (depending on jurisdiction of intersection and corridor location) specifying reductions in level of service (LOS) of the With Project scenarios when compared to the Without Project scenarios. As shown in Tables 4.12.2-18 of the LAX Landside Access Modernization Program EIR, under the 2024 Future With Project scenario, significant (and cumulatively considerable) impacts would occur at one intersection during the a.m. peak hour; at four intersections during the p.m. peak hour; at one intersection during both the a.m. and p.m. peak hour; and at two intersections during the mid-day peak hour. As shown in Table 4.12.2-20 of the LAX Landside Access Modernization Program EIR, under the 2035 Future With Project scenario, significant (and cumulatively considerable) impacts would occur at one intersection during the a.m. peak hour; at five intersections during the p.m. peak hour; at two intersections during both the a.m. and p.m. peak hour; and at four intersections during the mid-day peak hour.

The EIR identified 13 Project-specific Mitigation Measures to address off-airport traffic impacts, including:

- Implementation of a Transportation Demand Management Plan
 - MM-ST (LAMP)-6. Transportation Demand Management (TDM) Program.
- Intelligent System Improvements
 - MM-ST (LAMP)-7. Signal System Corridor Improvements – Intelligent Transportation System (ITS), City of Inglewood.
 - MM-ST (LAMP)-8. Signal System Corridor Improvements – Closed Circuit TV (CCTV) Camera and Changeable Message Signs (CMS) Installation
- Intersection Improvements
 - MM-ST (LAMP)-9. Modify the Intersection of Airport Boulevard and Century Boulevard.
 - MM-ST (LAMP)-10. Modify the Intersection of Arbor Vitae Street and Concourse Way-Isis Avenue.
 - MM-ST (LAMP)-11. Modify the Intersection of La Cienega Boulevard and Arbor Vitae Street.
 - MM-ST (LAMP)-12. Modify the Intersection of La Cienega Boulevard and Century Boulevard.
 - MM-ST (LAMP)-13. Modify the Intersection of La Cienega Boulevard and Florence Avenue.
 - MM-ST (LAMP)-14. Modify the Intersection of Inglewood Avenue and Century Boulevard.
 - MM-ST (LAMP)-15. Modify the Intersection of I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway.
 - MM-ST (LAMP)-16. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard.
 - MM-ST (LAMP)-17. Modify the Intersection of Sepulveda Boulevard and Century Boulevard.
 - MM-ST (LAMP)-18. Modify the Intersection of La Brea Avenue/Hawthorne Boulevard and Century Boulevard.
- Fair-Share Contributions to Highway Improvements

Implementation of these Project-specific mitigation measures would fully mitigate all Project-related intersection impacts under the 2024 With Project scenario to less than significant levels. Incorporation of the mitigation measures in the 2035 Future With Project condition would result in seven intersections with less than significant impacts and one intersection (La Cienega Boulevard and Arbor Vitae Street) with a significant unavoidable impact

which would also be cumulatively considerable. The EIR concluded that no feasible further mitigation measures within LAWA's control are available to reduce this impact to a less than significant level. Additionally, under the 2035 With Project conditions, one freeway segment, the I-405 at La Cienega Boulevard (northbound), would be significantly impacted and would also be a cumulatively considerable impact. Implementation of the fair share contribution to I-405 mobility improvements would not fully mitigate the significant impact; impacts to this freeway segment would be significant and unavoidable.

One of the proposed refinements to the approved Project was recognized as having potential to affect off-Airport traffic: relocation of the SBO. Operations of the proposed LAX SBO would relocate 46 Airport-employees within the local traffic system from the existing SBO on the west side of the Airport to a new SBO at the ITF West. Under existing conditions the SBO contains 46 employees. As outlined in Appendix C, Table 7, employment at the existing SBO is anticipated to increase regardless of the proposed refinements. More detailed information on the traffic analysis related to the SBO relocation are provided in **Appendix C**. None of the other proposed refinements would result in a significant change to the off-Airport surface transportation network.

The traffic analysis for the relocation of the SBO evaluates the potential effects on the street system produced by the approved Project and relocated SBO, including analysis of peak hour traffic volumes and intersection LOS for a focused study area of 30 intersections with the potential to be impacted (within the traffic analysis study area described in the EIR). Relocation of the SBO would not result in additional trips generated in the traffic analysis study area, but a shifting of trips within the traffic analysis study area.

Under the 2024 Future With Project and SBO relocation scenario, traffic impacts would be the same as those reported in the EIR. There would be significant (and cumulatively considerable) impacts at one intersection during the a.m. peak hour; at three intersections during the p.m. peak hour; at one intersection during both the a.m. and p.m. peak hour; and at two intersections during the mid-day peak hour. These intersection impacts are the same as the previous impacts identified in the LAX Landside Access Modernization Program EIR. Through incorporation of the EIR Mitigation Measures MM-ST (LAMP)-6 through MM-ST (LAMP)-18, impacts to these intersections for 2024 conditions including the approved Project and relocated SBO would be fully mitigated, consistent with the findings from the EIR.

Under the 2035 Future With Project scenario, traffic impacts would be the same as those reported in the EIR. There would be significant (and cumulatively considerable) impacts at one intersection during the a.m. peak hour; at two intersections during the p.m. peak hour; at two intersections during both the a.m. and p.m. peak hour; and at three intersections during the mid-day peak hour. These intersection impacts are the same as the previous impacts identified in the LAX Landside Access Modernization Program EIR; the Project refinements do not create any new intersection impacts or increase the severity of those impacts. Incorporation of the EIR Mitigation Measures MM-ST (LAMP)-6 through MM-ST (LAMP)-18 would still fully mitigate the impacts at two of the three intersections that would be significantly impacted by the approved Project with the Project refinements. A residual impact would remain at the intersection of La Cienega Boulevard and Arbor Vitae Street during the a.m. and p.m. peak hours, consistent with the residual impacts from the EIR.

As documented in Appendix C, the relocation of the SBO would have no additional significant intersection impacts beyond those reported in the EIR for the 2024 and 2035 With Project traffic conditions as compared to the 2024 and 2035 Without Project traffic conditions. Therefore, no significant change in off-Airport transportation/traffic impacts are anticipated from the proposed Project refinements in this Addendum.

5.2.3.2 DETERMINATION

Determination: *No New Significant Environmental Effects or a Substantial Increase in the Severity of Previously Identified Significant Effects Preparation of a Subsequent EIR*

Conclusions Regarding Applicability of State CEQA Guidelines Section 15162:

The proposed refinements to the approved Project would not substantially increase the severity of previously identified off-Airport traffic impacts, nor would they result in any new significant effects that were not previously identified in the LAX Landside Access Modernization Program EIR. The mitigation measures previously adopted for the approved Project (MM-ST (LAMP)-6 through MM-ST (LAMP)-18) would be applied to the proposed refinements, as applicable, in a manner consistent with those suggested in the EIR. No additional mitigation measures would be required for the proposed refinements. Therefore, the impacts to off-Airport transportation/traffic as a result of the proposed Project refinements would not trigger any of the conditions described in State CEQA Guidelines Section 15162 requiring preparation of a subsequent EIR.

6. CUMULATIVE IMPACTS

As described above in Section 5, as with the approved Project analyzed in the LAX Landside Access Modernization Program EIR, the proposed refinements to the approved Project would not result in any new significant or more severe impacts related to: aesthetics (shading, light and glare); agricultural and forestry resources; biological resources; cultural resources (archaeological resources, paleontological resources, human remains); greenhouse gas emissions; geology/soils; hazards and hazardous materials; human health; hydrology, water quality, and groundwater; land use and planning; mineral resources; noise; population and housing; public services (fire protection and law enforcement); recreation; and utilities and service systems.

Additionally, there were several environmental topics/resource areas that were found to have significant and unavoidable impacts in the certified Final EIR but would not be affected by the proposed refinements, including: aesthetics (visual character); cultural resources (historic resources); greenhouse gas emissions (plan/policy consistency); transportation/traffic; and public services (schools).

The LAX Landside Access Modernization Program EIR determined that the approved Project would result in unmitigable cumulatively considerable impacts for air quality and transportation/traffic before mitigation. The analyses below provide additional information related to cumulative impacts in addition to the cumulative analysis provided in Section 5.

6.1 AIR QUALITY

The LAX Landside Access Modernization Program EIR determined that construction of the approved Project would be cumulatively considerable for VOC, NO_x, and PM₁₀. Additionally, operational contributions to air quality impacts would be cumulatively considerable for all analyzed criteria air pollutants except SO₂. Analysis provided in Appendix A showed that the addition of emissions associated with proposed Project refinements would not change any significance determination presented in the EIR regarding regional or local operations emissions. Therefore, cumulative air quality impacts identified in the EIR would remain unchanged. As discussed in Section 4.2.1.6.3 of

the LAX Landside Access Modernization Program EIR, project-related cumulative impacts are based on the regional significance of a project's emissions. Project-related significance did not change relative to regional emissions; therefore, the Project's cumulative impacts including the proposed refinements would not differ from those presented in the LAX Landside Access Modernization Program EIR. The mitigation measures recommended in the EIR would be applied to the construction and operation of the proposed refinements in a manner consistent with those suggested in the EIR.

6.2 CONSTRUCTION NOISE AND VIBRATION

As discussed in Section 4.9.3.8 of the LAX Landside Access Modernization Program EIR, implementation of mitigation measures would reduce construction equipment noise to a level that would be less than significant, and the Project's incremental contribution to significant construction equipment noise impacts would be less than cumulatively considerable. While the potential expedited construction in Manchester Square would have the potential to result in a change in the proximity of noise-sensitive land uses to the approved Project components during the construction period, these potential impacts would be mitigated through measures stipulated in the LAX Landside Access Modernization Program EIR. Implementation of Standard Control Measure (Mitigation Measure) LAX-N-1 and Mitigation Measure MM-N (LAMP)-1 would reduce significant Project-related construction equipment noise impacts to a level that would be less than significant, and the Project's incremental contribution to significant construction equipment noise impacts would be less than cumulatively considerable, because construction activities would not exceed ambient exterior noise levels by 5 dB(A) at a noise-sensitive use.

6.3 OFF-AIRPORT TRANSPORTATION/TRAFFIC

The off-Airport traffic analysis included in the LAX Landside Access Modernization Program EIR identified one intersection for the 2035 With Project condition as having a significant and unavoidable impact which would also be cumulatively considerable. Analysis found that there are no feasible further mitigation measures within LAWA's control to reduce this impact to a less than significant level. As discussed in Appendix C, none of the proposed refinements, including relocation of the SBO, would affect the significance determinations in the EIR; there would be no additional significant intersection impacts beyond those reported in the LAX Landside Access Modernization Program EIR. None of the proposed Project refinements would substantially affect the cumulative traffic impacts that are addressed in the certified LAX Landside Access Modernization Program EIR.

6.4 ANALYSIS OF THE PROPOSED CHANGE IN THE PROJECT

The nature and characteristics of the proposed refinements to the approved Project do not represent a substantial change to the overall approved LAX Landside Access Modernization Program and, based on the discussions above, implementation of the refinements would not substantially affect the analysis or conclusions regarding cumulative impacts that are addressed in the certified LAX Landside Access Modernization Program EIR.

7. ASSESSMENT OF CHANGES IN IMPACTS

Section 15164 of the State CEQA Guidelines identifies the circumstances that permit the preparation of an addendum. The State CEQA Guidelines state that, "The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." The State CEQA Guidelines also require that a brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

An explanation of why none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR have occurred is provided below.

- (1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*

The proposed refinements analyzed in this Addendum do not constitute substantial changes to the overall approved LAX Landside Access Modernization Program that would involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

- (2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*

There have not been any significant changes with respect to the circumstances under which the LAX Landside Access Modernization Program, including the proposed refinements, is undertaken, that would result in a new significant environmental impact or a substantial increase in the severity of previously identified significant effects, including changes in City regulations related to the Airport property or changes in the federal or State rules related to Airport operations.

- (3) *New information of substantial importance, which was not known and could not have been known, with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*

- (A) *The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration.*

- (B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR.*

- (C) *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.*

There is no new information of substantial importance, which was not known and could not have been known, with the exercise of reasonable diligence at the time the previous EIR was certified that shows that the LAX Landside Access Modernization Program, including the proposed refinements, would result in a new significant environmental impact or a substantial increase in the

severity of previously identified significant effects, or that mitigation measures previously found infeasible would in fact be feasible. Further, all mitigation measures and Project Design Features identified in the LAX Landside Access Modernization Program EIR's Mitigation Monitoring and Reporting Program remain applicable.

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

No additional mitigation measures or alternatives have been identified that would substantially reduce the significant impacts identified in the LAX Landside Access Modernization Program EIR. Previously identified mitigation measures and Project Design Features contained in the LAX Landside Access Modernization Program EIR's Mitigation Monitoring and Reporting Program remain applicable.

8. CONCLUSION

Based on this analysis and the information contained in this Addendum, the design, layout, and implementation of the proposed Project refinements would not result in a new significant impact or substantial increase in the severity of previously identified impacts in the LAX Landside Access Modernization Program EIR. There are no substantial changes to the circumstances under which the LAX Landside Access Modernization Program will be undertaken, and no new information of substantial importance which was not known and could not have been known when the LAX Landside Access Modernization Program EIR was certified has since been identified. Therefore, substantial evidence, including the analysis and information contained in this Addendum, supports the conclusion that none of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.