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Subject: ***Review of Final Environmental Impact Report  
Los Angeles International Airport (LAX) Landside Access Modernization Program  
Los Angeles, California***

Dear Ms. Impett:

On December 1, 2016, MRO Engineers, Inc., (MRO) completed a letter report documenting our review of the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Landside Access Modernization Program (Los Angeles World Airports, September 2016). Our review also addressed the traffic impact analysis prepared by Raju Associates (Raju), which was presented as Appendix O to the DEIR. (Reference: Raju Associates, Inc., *Draft Transportation Study for the Landside Access Modernization Program DEIR*, September, 2016.)

Los Angeles World Airports has recently released the Final Environmental Impact Report (FEIR) for the proposed project, which includes responses to the comments presented in our December 1 letter. This report presents the results of our review of the FEIR responses.

#### **FINAL ENVIRONMENTAL IMPACT REPORT REVIEW**

The FEIR responses to our comments regarding the DEIR Traffic and Transportation analysis did not fully satisfy our concerns regarding the validity of the analysis results. Our specific ongoing concerns are presented below, referenced to the FEIR Comment Number.

#### **LAMP-AL00012-3 – Traffic Volume Data Does Not Accurately Represent LAX Activity**

In this comment, we summarized the dates on which intersection traffic volume data used in the study was collected, by year as well as by month. One of our first observations was that the description in the DEIR of the year in which the data was collected differed from what we found based on inspecting the traffic study appendix.

The FEIR attempts to rectify this error by including modifications in Chapter 3, Corrections and Additions to the Draft EIR. The proposed revision is incomplete, however, as it only accounts for 177 of the 183 study intersections. Specifically, it fails to note that the data for six of the study intersections was collected in 2013. Interestingly, the original DEIR text (p. 4.12-59) included the 2013 locations, so the revision serves to obfuscate rather than clarify.

This is a critical omission, as it glosses over the fact that those antiquated traffic counts violate a stated policy of the Los Angeles Department of Transportation (LADOT), as presented in LADOT's *Traffic Study Policies and Procedures* (August 2014). Page 7 of the document states:

*The traffic study should not use any traffic counts that are more than two years old.*

This violation of LADOT policy requires that new data be collected for those six locations, as well as any other locations at which the data would now be more than two years old.

We also noted that none of the intersection data was collected during the month of August, which the DEIR demonstrates is the peak month of passenger activity at LAX. Further, only about 13 percent of the counts were conducted during the summer season as a whole (i.e., June, July, and August), which is described in the DEIR (p. 4.12-11) as the peak season at LAX.

In fact, almost half of the intersection counts were performed in the month of March, which is the eighth busiest month at LAX. Furthermore, over 20 percent of the intersections were counted in the month of April, which is the sixth busiest month at LAX. Only 18 percent of the intersection turning movement counts were performed during the five busiest months at LAX; the remaining 82 percent of the counts were conducted during the slowest seven months of the year.

The FEIR response states that, in order to provide a conservative evaluation of traffic conditions, all available traffic counts for the study intersections were evaluated and, “. . . the count that reflected the maximum traffic volumes for that intersection, irrespective of the specific month in which they were collected . . .” were used in the analysis. Of course, with this approach, it is impossible to know whether the available counts are high, low, or in between, much less whether they adequately represent the level of activity at LAX.

In a further attempt to justify the use of data collected during the slowest months at LAX, the FEIR response presents AM and PM peak hour data for ten intersections for the summer (June – August) and non-summer (September – May) months. The validity of this data is obviously questionable. For example, during the non-summer months of September through May, there are over 100 days on which data might be collected (assuming counts would only be conducted on Tuesday, Wednesday, or Thursday and allowing for holiday weeks when no data collection might occur). Recognizing the variation in traffic volumes from one day to the next, the FEIR again provides no indication where the volumes represented in Table 1 of the response fall in the possible range of volumes.

Similarly, Table 2 in the FEIR provides summer and non-summer volumes for freeway segments, based on information in the Caltrans Performance Management System (PeMS). Again, AM and PM peak hour volumes are provided for summer and non-summer conditions. No explanation is provided with respect to how the specific values were selected for presentation here. Are the values in Table 2 the highest available? The lowest? The average? In short, no meaningful conclusion can be reached from the limited data presented.

In summary, we remain concerned that the traffic volume data employed in the traffic impact analysis is not representative of peak levels of activity at LAX. Consequently, it is likely that the level of service findings presented throughout the document provide an overly optimistic view of the average vehicular delay and the current level of congestion in the study area.

#### **LAMP-AL00012-4 – Inadequate Midday Study Area**

In this comment, we stated that it was inappropriate to limit the midday traffic analysis to the 36 arbitrarily selected locations addressed in the DEIR. Also, we noted that while the midday traffic counts were generally conducted between 11:00 AM and 2:00 PM, a distinct peak in LAX passenger arrival and departure activity is shown at about 11:00 AM, which is higher than the total passenger activity shown in the AM and PM peak periods. In fact, the volume of traffic generated

at LAX in the midday peak hour is 25 – 30 percent higher than either the AM or PM peak hours. Therefore, we commented that it is inappropriate to limit the midday traffic analysis to the 36 arbitrarily selected locations addressed in the DEIR. We identified 14 intersections that operate at LOS D or worse in either or both of the AM and PM peak hours, which is a reasonable indicator that they might operate poorly in the midday peak hour, as well. In addition to expanding the midday study area, because of the magnitude of passengers arriving at about 11:00 AM, the midday analysis should include the 10:00 – 11:00 AM hour, when much of the traffic associated with those arrivals will occur.

The response states that the external street system experiences peaks during the AM and PM peak periods, rather than during the midday period. While this is true at many study locations, it is not universally true. For example, the midday V/C ratio at the intersection of Sepulveda Boulevard/I-105 Westbound ramps is higher in the midday peak hour (0.921, LOS E) than in the PM peak hour (0.901, LOS E). Moreover, because traffic patterns in the midday period differ from those found in either the AM or PM peak periods (e.g., different directional flow characteristics), it is impossible to determine whether project-related impacts might occur without actually performing the analysis.

In fact, the response suggests that some level of additional analysis was conducted beyond the documented midday study boundaries that was not reported in the DEIR. Specifically, it says:

*The adequacy of the geographic scope was ensured based on the fact that the boundary locations where mid-day traffic volume changes due to the proposed Project did not reveal significant traffic impacts under the Baseline (2015) With Project, Future (2024) With Project, Future (2035) With Project, and Future (2035) With Project and Potential Future Related Development scenarios.*

If this is the case, it is unclear why these additional intersection analyses were not revealed in the DEIR, so that they might be subject to public scrutiny.

In summary, we believe that the limited study area addressed for the midday time period inadequately addresses the potential impacts of the proposed project.

#### **LAMP-AL00012-6 – Inconsistent On-Airport and Off-Airport Traffic Analyses**

In this comment, we expressed uncertainty as to whether the on-airport and off-airport traffic analyses were sufficiently consistent. The response clarified the process used to forecast traffic volumes on both systems, particularly with regard to ensuring consistency of the traffic forecasts.

We remain concerned about one aspect of the two analyses, which was not addressed in the FEIR response. As we noted in our comment, the on-airport traffic analysis addressed a peak departure period of 6:16 – 7:16 AM. In contrast, the AM peak-hour period addressed in the off-airport analysis reflected the highest hour within the 7:00 – 10:00 AM time period.

Given the fact that airport arrivals peak between approximately 6:00 and 7:00 AM, it seems prudent to expand the AM peak period to be considered in the off-airport traffic analysis to cover the 6:00 AM to 10:00 AM time period. Although this differs from the standard LADOT traffic impact analysis approach, we believe it is necessary to ensure that all airport-related traffic impacts are revealed, as well as to strengthen the connection between the two analyses.

### **LAMP-AL00012-7 – Inadequate Transit Analysis**

This comment described the absolute lack of any transit analysis that might serve as a credible basis for a finding of a “less than significant” impact, despite the claim that the proposed Project “may encourage passengers and employees to utilize transit.”

The response refers to the traffic study presented in DEIR Appendix O to describe the proposed project’s transit analysis. The Appendix O document includes descriptive material regarding the existing transit system, but its transit analysis (Raju, p. 430 - 431) is limited to several paragraphs, most of which constitute introductory or background information. The “analysis” itself is contained in a single paragraph, which states, in part:

*. . . the Project would not generate any additional new trips. In fact, the Project would reduce the number of trips on the street system under Baseline (2015) with Project, Future (2024) with Phase I Project and Future (2035) with Project conditions . . . Therefore, no further transit impact analysis is required by the Project under Baseline (2015) with Project, Future (2024) with Phase I Project and Future (2035) with Project conditions.*

Clearly, our comment regarding the lack of a valid transit analysis was valid.

The FEIR attempts to remedy this deficiency. The response to our comment begins with a misinterpretation of the introductory portion of our comment. It then describes certain policies established by the State of California aimed at encouraging development in proximity to transit and the potential availability of funding from federal and state sources. None of this, of course, relates to the transit-related impact associated with the proposed project.

The FEIR response next appears to rely on a separate and distinct transit improvement project proposed by the Los Angeles County Metropolitan Transportation Authority (Metro) to provide assurance that the proposed LAMP project will have a less than significant impact.

Eventually, the FEIR response provides a limited assessment of transit ridership, both with and without the proposed project. Unfortunately, the information is provided at a macroscopic level that provides little meaningful basis for a conclusion regarding project-related significance. Only total values for all transit routes in the vicinity of the proposed project are presented. No information is provided that is specific to individual transit routes or facilities. Furthermore, only daily totals are provided, despite the fact that, just like the roadway system, the key consideration regarding the effectiveness of the transit system is capacity in the peak periods. Thus, even though Table 3 in the FEIR response indicates that abundant transit capacity is available on a daily basis for the system as a whole, there is no assurance that buses on specific routes serving the LAX area will not be severely overloaded in the AM, midday, or PM peak hours.

In summary, the information provided in the FEIR is inadequate. Further detail must be provided to validate the finding of a less than significant impact.

### **LAMP-AL00012-8 – Deficient Construction Traffic Analysis**

In our comment concerning the deficient construction traffic analysis, we pointed out that the analysis effectively ignored the potential impacts associated with travel by the 966 construction

employees that are estimated to be on-site. The DEIR analysis addressed the 7:00 – 8:00 AM period (162 trips) and the 4:00 – 5:00 PM period (162 trips).

We pointed out that those assumed analysis hours just miss having to assess the impacts of substantial numbers of construction-related trips. For example, the DEIR indicates that 523 employee vehicles will arrive between 6:00 and 7:00 AM, along with a total of 162 truck trips, for a total traffic volume of 685 trips. The volume of traffic entering the site during that one-hour period (604 trips) is equivalent to the amount of traffic entering a 440,000-square-foot office building in the AM peak hour.

Similarly, in the PM, if the 3:00 – 4:00 PM hour had been considered, the traffic total would be 685 trips, including 523 departing employees and 162 truck trips. A 490,000-square-foot office building would generate an equivalent volume of outbound traffic (i.e., 604 trips) during this time period.

Furthermore, the concept of “peak spreading” is well-known on the Los Angeles roadway system. It describes how the highest traffic flows are not constrained to the typical “peak hours.” In fact, those heavy traffic volumes “spread” out of the peak hours into adjacent hours (such as 6:00 – 7:00 AM and 3:00 – 4:00 PM). For that reason, we believe that a meaningful conclusion regarding the significance of construction-related traffic can only be obtained by addressing the peak hours of that traffic.

Moreover, because those volumes are substantially higher than the values addressed in the DEIR, it is essential that the study area for the construction traffic analysis be expanded, as we suggested in our original comment. The FEIR response states that, “[t]he geographic scope of the construction traffic study area was determined by identifying the intersections most likely to be used by construction-related vehicles . . .” Of course, that analysis addressed only the relatively small number of truck trips. When construction worker trips are appropriately included in the analysis, the list of such intersections will grow.

#### ***LAMP-AL00012-10 – Deficient Transportation Demand Management Program***

In this comment, we sought additional information regarding the specific characteristics of the Transportation Demand Management (TDM) program proposed as Mitigation Measure MM-ST (LAMP)-6. Also, we asked for further assurance regarding the likely effectiveness of the program, as well as what would happen if subsequent surveys determined that the program was not meeting its goals.

The FEIR largely reiterates the contents of DEIR Section 4.12.2.9.1 (pp. 4.12-179 – 4.12-180). As such, no additional detail is provided. Despite this, the FEIR response describes the largely-undefined TDM program as “robust.”

With respect to what happens if the trip reduction goals are not met, those goals are simply described (with little or no basis) as “very conservative and small.”

In short, we remain unconvinced that the mitigation measure calling for implementation of a TDM program will have much meaningful effect in remedying the significant traffic impacts associated with the proposed project.

### **LAMP-AL00012-12 – *Nonexistent Project Access Analysis***

We commented that the DEIR had presented no analysis to evaluate the access systems at the three proposed project facilities that provide a total of 24,300 parking spaces. Among our concerns was whether vehicles will be able to enter the facilities without queuing back onto the public street. Also, will either entering or exiting vehicles be subject to excessive idling, which would affect air quality and greenhouse gas emissions?

The FEIR response to our comment misses the mark, in that it addresses operation of nearby intersections, but not the access locations themselves. Although the response claims that, “. . . detailed access system analysis and evaluation was conducted . . . ,” none of that information is presented in either the DEIR or the FEIR.

We are also concerned that the access locations described in the FEIR response for the ITF West facility differ from those illustrated on DEIR Figure 2-24. Specifically, Figure 2-24 indicates that access to and from that facility will be via two entrance and exit plazas located on New ‘B’ Street. The FEIR response says the entrance will be “. . . off of 96<sup>th</sup> Street and New A Street” and exiting will occur “. . . off of 96<sup>th</sup> Street and Airport Boulevard . . .”

### **LAMP-AL00012-17 – *Mitigation Measures – Indirect Impacts***

Our comment suggested that the indirect impacts of implementing the proposed mitigation measures had not been adequately addressed. The FEIR response begins with the following statement:

*It provides no evidence that indirect impacts of any mitigation measure are reasonably foreseeable or would be significant.*

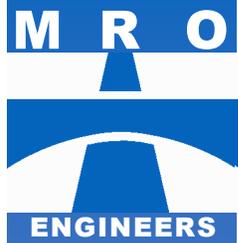
Assuming that the “It” in the response refers to our comment, we must note that we were unaware that it was our responsibility to perform the required DEIR analyses regarding potential indirect impacts. Had we been aware of that opportunity, we would have performed a meaningful analysis that actually addressed those impacts, unlike the proposed project’s DEIR/FEIR.

The response goes on to provide an essentially conclusory statement that the indirect effects of the mitigation measures would be less than significant. Consequently, we remain unconvinced that this matter has been adequately addressed.

### **LAMP-AL00012-18 – *Potential Future Development***

We commented that no information is presented in the traffic analysis to describe the specific land use assumptions or the volume of traffic associated with the 900,000 square feet of commercial space labeled as “potential future related development.” More importantly, no information is provided with respect to the volume of traffic to be generated by that development.

The FEIR response erroneously states that such information is presented in DEIR Section 4.12.2.7.2 and in Chapter 5 of the traffic report in DEIR Appendix O. In fact, nothing more specific than “900,000 square feet of commercial” is included in the traffic analysis. This lack of specificity makes it impossible to judge the validity of the traffic analysis results for this scenario.



*Ms. Laurel Impett, AICP*

*February 28, 2017*

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## **CONCLUSION**

Our review of the Final Environmental Impact Report for the LAX Landside Access Modernization Program in Los Angeles, California revealed several unresolved issues affecting the validity of the conclusions presented in the traffic impact analysis for the proposed project. We continue to assert that a modified traffic impact analysis must be prepared, and that the updated analysis should be incorporated into a revised environmental document.

We hope this information is useful. If you have questions concerning anything presented here, please feel free to contact me at (916) 783-3838.

Sincerely,

**MRO ENGINEERS, INC.**

A handwritten signature in blue ink that reads "Neal K. Liddicoat".

Neal K. Liddicoat, P.E.

Traffic Engineering Manager

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