

Appendix
LAX Master Plan Final EIS

**A-3b. Coastal Zone Management Act (CZMA)
Consistency Certification by City of Los Angeles**



Los Angeles World Airports

August 4, 2004

Mark Delaplaine
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45 Fremont Street, Suite 2000
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SUBJECT: Coastal Consistency Certification for the Los Angeles International Airport Master Plan

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City of Los Angeles
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Board of Airport Commissioners
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Interim Executive Director

Dear Mr. Delaplaine:

The City of Los Angeles World Airports (LAWA) is submitting this Coastal Consistency Certification in compliance with Section 930.50 *et seq.* of the National Oceanic and Atmospheric Administration Federal Consistency Regulations (Title 15 Code of Federal Regulations Part 930). As required by 15 CFR §930.57(b), LAWA has concluded that the proposed LAX Master Plan Alternative D complies with the enforceable policies of California's approved management program and will be conducted in a manner consistent with such program. The Final Environmental Impact Report (EIR) for the Proposed Master Plan Improvements (April 2004) provides the basis for this finding and is incorporated by reference.

The enclosed Coastal Consistency Certification discusses the joint federal and local planning associated with the proposed project, identifies the project areas and activities proposed by LAWA that are subject to consistency certification, and addresses the consistency of the LAWA proposal with provisions of the California Coastal Act.

LAWA looks forward to working with the California Coastal Commission and the Commission's staff on this important project.

Sincerely,

Jim Ritchie
Deputy Executive Director

cc: Larry Simone, California Coastal Commission
Dave Kessler, Federal Aviation Administration
Enclosure

**LOS ANGELES WORLD AIRPORTS
LOS ANGELES INTERNATIONAL AIRPORT**

**CITY OF LOS ANGELES,
CALIFORNIA**

**COASTAL CONSISTENCY CERTIFICATION
FOR
LOS ANGELES INTERNATIONAL AIRPORT MASTER PLAN**

I. AUTHORITY

The City of Los Angeles - Los Angeles World Airports (LAWA) is submitting this Coastal Consistency Certification in compliance with Section 930.50 *et seq.* of the National Oceanic and Atmospheric Administration Federal Consistency Regulations (Title 15 Code of Federal Regulations Part 930).

II. CERTIFICATION

As required by 15 CFR §930.57(b), LAWA has concluded that the proposed LAX Master Plan Alternative D complies with the enforceable policies of California's approved management program and will be conducted in a manner consistent with such program. The Final Environmental Impact Report (EIR) included with the Final LAX Master Plan Improvements provides the basis for the finding and is incorporated by reference.

III. JOINT FEDERAL AND LOCAL PLANNING AND THE CALIFORNIA COASTAL ACT

The Federal Aviation Administration (FAA) and LAWA are jointly proposing to undertake the improvements associated with Alternative D, as outlined in the April 2004 Final LAX Master Plan. LAWA has selected Alternative D as the staff-preferred alternative, and FAA will specify a preferred alternative in the Final EIS completed for the proposed LAX Master Plan. FAA, as a federal agency, is submitting a separate Coastal Consistency Determination in compliance with Section 930.34 *et seq.* of the National Oceanic and Atmospheric Administration Federal Consistency Regulations. In its consistency determination, the FAA has determined that the relocation of existing navigational aids and associated service roads at Los Angeles International Airport (LAX) is consistent to the maximum extent practicable with the California Coastal Management Program (CCMP), pursuant to the requirements of the Coastal Zone Management Act of 1972, as amended, (CZMA) and the California Coastal Act of 1976, as amended (CCA). Direct impacts to, and occurring within the coastal zone due to the relocation of existing navigational aids and associated service roads, whereby FAA is the lead agency for those improvements are addressed in the Coastal Consistency Determination, while impacts to the coastal zone due to activities originating outside of the coastal zone that are being initiated and requested by the City of Los Angeles (i.e., LAWA) are addressed within this Coastal Consistency Certification.

IV. PROJECT AREAS AND ACTIVITIES SUBJECT TO CONSISTENCY CERTIFICATION

The planning for, and evaluation of, improvements proposed for Los Angeles International Airport (LAX) have been underway for approximately a decade. This work effort occurred

within the context of formulating a Master Plan for the future of LAX, specifically at the year 2015. Three "build" alternatives - Alternatives A, B, and C - for the LAX Master Plan, and a "no build" alternative - the No Action/No Project Alternative - were addressed in a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) published in January 2001. In response to the terrorist attacks that occurred on September 11, 2001, the newly elected Mayor of Los Angeles directed the Los Angeles Board of Airport Commissioners to develop a new fifth alternative for the LAX Master Plan that, consistent with public comment calling for a regional approach alternative, would accommodate passenger and cargo activity levels at LAX that would approximate those of the No Action/No Project Alternative, have fewer environmental impacts than the No Action/No Project Alternative and would be designed to enhance airport safety and security. That fifth alternative - Alternative D, the Enhanced Safety and Security Plan - was developed in consultation with LAWA staff and the FAA, and was addressed in the Supplement to the Draft EIS/EIR published in July 2003. Alternative D represents LAWA's staff-preferred alternative, as presented of the Final EIR published in April 2004. **Figure 1**, Existing Conditions 1997, shows the existing (1997) layout of LAX, and **Figure 2**, Alternative D - 2015 Enhanced Safety and Security Plan, presents the proposed future (2015) layout of LAX under Alternative D. The following summarizes some of the key aspects of Alternative D, with additional details regarding the proposed Project being provided in Chapter 3, *Alternatives*, of the Final EIR.

Alternative D emphasizes the maintenance of LAX's role as an international gateway and encourages a long-term regional approach to serving air traffic demand in the Los Angeles basin by designing facilities at LAX to accommodate passenger and cargo activity levels equivalent to the No Action/No Project Alternative activity level, but would be designed to allow air carriers to emphasize international routes at LAX.

Alternative D would enhance security by limiting access by private vehicles to the main airport infrastructure to reduce the risk to airport users. The public parking structures in the CTA would be relocated and would be replaced by new centralized passenger terminals. The existing Terminals 1 through 7 would be reconfigured. The Tom Bradley International Terminal (TBIT) would be reconfigured with the addition of a new North/South Linear Concourse. A West Satellite Concourse would be built west of the TBIT.

Enhanced airfield safety would be achieved through airfield facility modifications that would mitigate the primary causes of runway incursions at LAX. In addition, airfield improvements would be made to enable the existing runway systems to better accommodate aircraft operations and meet FAA standards. The number of runways would remain the same at four. Two existing runways would be moved - one by approximately 50 feet and the other by approximately 340 feet, two runways would be lengthened - one by approximately 1,400 feet and the other by approximately 1,500 feet, and all runways would be further separated from one another to improve operational efficiency and safety.

A new Ground Transportation Center (GTC) and an Intermodal Transportation Center (ITC) would be constructed east of Aviation Boulevard and would be the primary access points for all passenger drop-off and pick-up and vehicle parking. Passengers and employees would access the CTA via an APM system from new GTC, ITC and consolidated Rent-A-Car (RAC) facilities. Intersection improvements would be made to the off-airport transportation

network to accommodate the shift in traffic patterns from the CTA to the GTC and ITC areas. Some cargo facilities would be modified under Alternative D, with the overall square footage being equivalent to the No Action/No Project Alternative. A new 12,400-stall employee parking structure would be constructed in the western portion of LAX, on World Way West.

The 340-acre, LAX Northside area located directly north of the airport, but within the Master Plan boundary, is currently entitled (i.e., recognized within the City's current General Plan and Zoning) for 4.5 million square feet of development. Under Alternative D, the existing trip cap that exists for LAX Northside would be reduced to limit vehicle trips.

V. CONSISTENCY OF LAWA PROPOSAL WITH PROVISIONS OF THE CALIFORNIA COASTAL ACT

This portion of the local agency consistency certification analyzes consistency between policy sections of the California Coastal Act (Division 20, California Public Resources Code) and LAWA proposals and actions at LAX resulting in direct and indirect impacts on resources within the California Coastal Zone boundary. Policies that are generally not applicable to, and/or unaffected by, LAWA's proposal to develop Alternative D of the LAX Master Plan are listed first, along with a brief explanation supporting that conclusion for each such policy. Policies determined to be more relevant to the proposed Project are listed next, and are accompanied by discussion and analysis related to the subject issue. Also provided is a summary of public comments received during the public review periods for the LAX Master Plan Improvements Draft EIS/EIR and the Supplement to the Draft EIS/EIR that relate to such policies, as well as a summary of the written responses provided to such comments.

A. POLICIES UNDER THE CALIFORNIA COASTAL ACT THAT ARE NOT APPLICABLE TO, OR AFFECTED BY, THE LAWA PROPOSAL

Article 2 (Public Access):

- §30210 Posting of access
- §30211 Development shall not interfere with access;
- §30212 Access from new projects
- §30212.5 Distribution of public facilities;
- §30213 Encouragement of lower cost visitor and recreational facilities;
- §30214 Implementation of public access policies; legislative intent;

The majority of proposed Alternative D improvements at LAX are removed from the coastal area (see Figure 2) and do not affect coastal access or visitor/recreational facilities addressed in Article 2. Consistency of the proposed relocation of existing navigational aids that occur within the coastal zone is discussed in FAA's consistency determination. As discussed in Section 4.14, *Coastal Zone Management and Coastal Barriers*, of the Final

EIR, existing coastal access routes and postings to those routes would be maintained, development would not interfere with the public's access from Pershing Drive and Vista del Mar to the shoreline, no public facilities would be constructed within the coastal zone, no lower cost visitor and/or recreational facilities would be affected, and no public access policies would change as a result of implemented Alternative D.

Article 3 (Recreation)

- *§30220 Protection of unique water-oriented activities;*
- *§30221 Protection for recreational use and development of oceanfront land;*
- *§30222 Priority of development purposes of private lands;*
- *§30222.5 Oceanfront lands; aquaculture facilities; priority of oceanfront lands suitable for aquaculture;*
- *§30223 Reservation of upland areas;*
- *§30224 Encouragement of recreational boating use;*

The proposed Alternative D improvements at LAX do not relate to, or affect, coastal recreation. No coastal areas suitable for water-oriented activities would be affected, no oceanfront land would be developed, priorities afforded to visitor-serving commercial recreational facilities would not be affected, no oceanfront land suitable for aquaculture would be affected, and recreational boating use would not be affected by Alternative D improvements. As an upland area adjacent to three coastal recreational areas, Vista del Mar Park, the South Bay Bike Trail and Dockweiler State Beach, existing and future LAX operations do, and would continue to, generate elevated noise levels at these recreational sites when flights are overhead. Analysis included in Section 4.8, *Department of Transportation Act, Section 4(f)*, of the Final EIR shows that noise levels at Vista del Mar Park, the South Bay Bike Trail, and at Dockweiler State Beach would increase slightly as compared to 1996 and 2000 conditions. However, given the frequent use of Vista del Mar Park, the South Bay Bike Trail, and Dockweiler State Beach despite the current elevated noise levels, the modest increases associated with Alternative D are not anticipated to affect the usage of these recreational facilities.

Article 4 (Marine Environment):

- *§30230 Maintenance and restoration of marine resources;*
- *§30231 Maintenance and restoration of water quality;*
- *§30232 Protection against spills of oil and hazardous substances;*
- *§30234 Protection of commercial fishing and recreational boating industries*
- *§30234.5 Importance of fishing activities*

- §30235 *Revetments, breakwaters, etc.;*
- §30236 *Waterway modification; mitigation; restrictions;*
- §30237 *Habitat conservation plan; Bolsa Chica;*

The majority of proposed Alternative D improvements at LAX are removed from the coastal zone and from marine resources. Consistency of the proposed navigational aids relocation is discussed in FAA's consistency determination. The Alternative D project activities do not involve revetments/breakwaters, do not involve dredging, diking, filling in areas within the coastal zone, do not affect boating or fishing, and are not located near Bolsa Chica.

To prevent impacts to the coastal zone and coastal waters from erosion and runoff at LAX, LAWA would implement Master Plan Commitment HWQ-2, as discussed in Section 4.7, *Hydrology and Water Quality*, of the Final EIR, related to preparing a Conceptual Drainage Plan prior to initiating construction. This plan would include the preparation of an airport-wide Standard Urban Storm Water Mitigation Plan (SUSMP) with BMPs to be incorporated into the LAX Storm Water Pollution Prevention Plan (SWPPP). LAWA also would comply with mitigation measure MM-HWQ-1, outlined in Section 4.7 of the Final EIR, to upgrade regional drainage facilities.

Alternative D, as with current operations at LAX, would involve the use and transport of oil and hazardous substances on the premises. As discussed in Section 4.23, *Hazardous Materials*, and Section 4.24.3, *Safety*, of the Final EIR, hazardous materials at LAX are stored at the Central Utility Plant, the Fuel Farm, and the CNG/LNG facility; none of these facilities lies within the coastal zone. To prevent and mitigate any impacts to LAX and the coastal zone associated with these facilities, each facility has safety and emergency response elements incorporated into its design, operation, and emergency response procedures, as discussed in detail in Section 4.24.3 of the Final EIR.

Article 5 (Land Resources):

- §30241 *Prime agricultural land; maintenance in agricultural production;*
- §30241.5 *Agricultural lands; determination of viability of uses; economic feasibility evaluation;*
- §30242 *Lands suitable for agricultural use; conversion;*
- §36243 *Productivity of soils and timberlands; conversions;*

The majority of proposed Alternative D improvements at LAX are removed from the coast and none of the Project area involves or affects the use or conversion of agricultural and or timber lands. As discussed in Section 4.16, *Farmland* of the Final EIR, no prime or viable agricultural land is located at or in the coastal area surrounding LAX, no land at LAX is suitable for agricultural use, and no timberlands would be converted as a result of Alternative D.

- §30244 *Archaeological or paleontological resources.*

The proposed Alternative D improvements at LAX would not directly or indirectly affect any known archaeological or paleontological resources within the coastal zone. According to previous archaeological and paleontological surveys, as discussed in Section 4.9, *Historic/Architectural and Archaeological/Cultural and Paleontological Resources*, of the Final EIR, no known archaeological or paleontological resources exist within the coastal zone area of the LAX property. As discussed in Section 4.9.1 of the Final EIR, one historic building, a WWII munitions storage bunker, is located within the coastal zone. The proposed improvements would not affect, or be located near, the bunker. In the event that previously unidentified archaeological and/or paleontological resources were to be discovered during construction efforts, implementation of mitigation measures MM-PA-1 through MM-PA-7, included in Section 4.9.2 of the Final EIR, would reduce impacts to these resources. Therefore, no archaeological or paleontological resources within the coastal zone would be adversely affected.

Article 6 (Development):

- §30250 *Location, existing developed areas.*

With the exception of the proposed navigational aid relocation for runway 6R/24L, the proposed Alternative D improvements at LAX are outside of the coastal zone. For impacts and compatibility discussions associated with the proposed relocated navigational aids, refer to FAA's Coastal Consistency Determination.

- §30251 *Scenic and visual qualities.*

The majority of proposed Alternative D improvements at LAX are substantially outside of, and not visible from, the coastal zone surrounding LAX. As discussed in FAA's consistency determination, the relocated navigational aids would not be visible from surrounding streets. Under Alternative D, a four-level employee parking structure is proposed on property in the western portion of LAX (east of the coastal zone). As discussed in Section 4.21, *Design, Art and Architecture Application/Aesthetics*, of the Final EIR, views of the employee parking structure from the coastal zone would be limited and would not represent an aesthetic or view impact to the scenic and visual qualities of the coastal zone.

- §30253 *Development Mandates*

Based on the information and analysis provided in Section 4.22, *Earth/Geology* and Section 4.24, *Human Health and Safety*, the proposed Alternative D improvements at LAX would not occur within areas of high geological, flood and fire hazard, nor would they create or contribute significantly to erosion, geological instability, or destruction of the LAX site or surrounding area. The proposed Alternative D improvements would not conflict with any applicable SCAQMD and State Air Resources Board requirements (see Section 4.6, *Air Quality*), would provide for energy conservation measures (see Section 17.1, *Energy Supply*), would provide for improvements in local traffic conditions, particularly as compared to future traffic conditions under the No Action/No Project Alternative (see Section 4.3.2, *Off-Airport Surface Transportation*), and would not affect any popular visitor destination points or recreational uses (see Sections 4.2, *Land Use*, 4.8, *Department of Transportation Act*,

Section 4(f), Section 4.14, *Coastal Zone Management and Coastal Barriers*, and Section 4.26.3, *Parks and Recreation*).

- *§30254 Public works facilities design.*

The proposed Alternative D improvements at LAX are designed specifically to accommodate passenger and cargo activity levels comparable to those accommodated under the No Action/No Project Alternative. Alternative D would enhance safety and security at LAX while accommodating a future (2015) capacity of 78.9 million annual passengers (MAP), which is comparable to that of the No Action/No Project Alternative in 2015.

- *§30254.5 Sewage treatment plant development; prohibition on terms and conditions*

The proposed Alternative D improvements at LAX do not involve the construction of a sewage treatment plant.

- *§30255 Priority of coastal-dependent developments.*

LAX is not a coastal-dependent use, and implementation of the proposed Alternative D improvements at LAX would not hinder the development or priority for development of other coastal-dependent uses. On its western boundary, LAX would not be developing any previously undeveloped coastal land.

Article 7 (Industrial Development):

- *§30260 Expansion or location of industrial development;*
- *§30261 Use of tanker facilities; liquefied natural gas terminals;*
- *§30262 Oil and gas development;*
- *§30263 Refineries or petrochemical facilities;*
- *§30264 Thermal electric generating plants;*
- *§30265 Legislative findings and declarations; offshore oil transport and refining; and*
- *§30265.5 Governor or designee; coordination of activities concerning offshore oil transport and refining; duties.*

The majority of proposed Alternative D improvements at LAX are removed from the coastal zone and do not involve industrial development. LAX is not a coastal-dependent industrial facility and no new tanker, oil and gas development, refineries or petrochemical facilities, or thermal-electric generating plants are proposed. Improvements associated with Alternative D would not involve offshore oil transportation.

B. RELEVANT POLICIES OF THE CALIFORNIA COASTAL ACT

Article 4, Marine Environment

§30233 Diking, filling or dredging; continued movement of sediment and nutrients

(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:

- (1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.*
- (2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.*
- (3) In wetland areas only, entrance channels for new or expanded boating facilities; and in a dredged wetland, identified by the Department of Fish and Game pursuant to subdivision (b) of Section 30411, for boating facilities if, in conjunction with such boating facilities, a substantial portion of the degraded wetland is restored and maintained as a biologically productive wetland. The size of the wetland area used for boating facilities, including berthing space, turning basins, necessary navigation channels, and any necessary support service facilities, shall not exceed 25 percent of the degraded wetland.*
- (4) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.*
- (5) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.*
- (6) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.*
- (7) Restoration purposes.*
- (8) Nature study, aquaculture, or similar resource dependent activities.*

(b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for such purposes to appropriate beaches or into suitable longshore current systems.

(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or

estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California," shall be limited to very minor incidental public facilities, restorative measures, nature study, commercial fishing facilities in Bodega Bay, and development in already developed parts of south San Diego Bay, if otherwise in accordance with this division.

For the purposes of this section, "commercial fishing facilities in Bodega Bay" means that not less than 80 percent of all boating facilities proposed to be developed or improved, where such improvement would create additional berths in Bodega Bay, shall be designed and used for commercial fishing activities.

(d) Erosion control and flood control facilities constructed on watercourses can impede the movement of sediment and nutrients which would otherwise be carried by storm runoff into coastal waters. To facilitate the continued delivery of these sediments to the littoral zone, whenever feasible, the material removed from these facilities may be placed at appropriate points on the shoreline in accordance with other applicable provisions of this division, where feasible mitigation measures have been provided to minimize adverse environmental effects. Aspects that shall be considered before issuing a coastal development permit for such purposes are the method of placement, time of year of placement, and sensitivity of the placement area.

Comment and Analysis:

As discussed in Section 4.11, Endangered and Threatened Species of Flora and Fauna and Section 4.12, *Wetlands* of the Final EIR, approximately 1.3 acres of degraded wetland habitat containing embedded cysts of the Riverside fairy shrimp is located in the western airport operations area of LAX property. This wetland area is not located within the coastal zone. The degraded wetland habitat does not have any hydrological or habitat links to the coastal zone resources (i.e., the subject wetlands are isolated depressions that, on occasion, receive water from runoff in the immediate area, and contain fairy shrimp cysts specific to that setting). The subject habitat area is subject to routine operations and maintenance activity in compliance with Title 14, CFR Part 139, which mandates that the airport operations area be maintained in such a condition so as to minimize or eliminate hazards to public safety resulting from wildlife utilization. The ponding of water would serve as an attractant to birds, and this poses a safety risk to aviation uses. In light of the existing provisions and measures to avoid the ponding of water within the subject degraded wetlands, with the specific intention of discouraging/avoiding the use of these degraded wetlands by wildlife, these wetlands do not provide a habitat link to coastal birds.

Alternative D would impact 0.4 acre (1,853 square feet) of the degraded wetland habitat. Ongoing operations and maintenance activities at LAX would impact the remaining 1.26 acres of degraded wetland habitat. It should be noted that the entire 1.3 acres of degraded wetland habitat would be impacted by such ongoing operations and maintenance activities, even if Alternative D were not approved. Onsite conservation of Riverside fairy shrimp within the airport operations area would be incompatible with FAA guidelines pursuant to 14 CFR, Section 139.337. Hazard management activities performed under these guidelines with respect to vegetation management include mowing, discing, and grading activities to ensure

safety, which is in direct conflict with habitat improvements for the Riverside fairy shrimp. These activities would result in the loss of habitat values for the Riverside fairy shrimp. However, with implementation of mitigation measure MM-ET-1, Riverside Fairy Shrimp Habitat Restoration, outlined in Section 4.11, *Endangered and Threatened Species of Flora and Fauna* of the Final EIR, soils containing cysts of Riverside fairy shrimp shall be moved to a suitable alternate location in coordination with the USFWS, thus providing an opportunity for the species' recovery.

Notwithstanding the fact that the subject degraded wetlands are located well outside of the coastal zone, the filling of those wetlands would not conflict with the three-part test under §30233(a)(5) for coastal zone projects involving wetland fill: (a) the allowable use test; (b) the alternatives test; and (c) the mitigation test. Under the first of these tests, a project must qualify as one of the eight stated uses allowed under §30233(a). Since the other allowable uses do not apply, the Commission must determine whether the proposed project can be permitted under §30233(a)(5), which authorizes fill for: *"Incidental public service purposes, including but not limited to, burying cables, pipes or inspection of piers and maintenance of existing intake and outfall lines."*

In order to be considered an "incidental public service purpose" a proposed fill project must satisfy two tests: (1) the project must have a "public service purpose," and (2) the purpose must be "incidental" within the meaning of that term as it is used in §30233(a)(5). Because the project would be constructed by a public agency for the purpose of providing transportation services to the public, the fill is for a public service purpose. Thus, the project satisfies the first test. With respect to the second test, given the types of previously-determined allowable uses by the Coastal Commission, the Commission supports interpretations of §30233(a)(5) to apply to forms of public transportation other than roads. The proposed LAX project would improve the safety, security, and efficiency of LAX without substantially increasing capacity beyond that which would otherwise occur even if no improvements were made at LAX (i.e., Alternative D is specifically designed to accommodate the same level of future (2105) airport activity as that of the No Action/No Project Alternative).

Under the second of the three-part test, based on the evaluations and analyses provided in the Final EIR for the LAX Master Plan, Alternative D is the environmentally preferred alternative (see Section 3.5, *The CEQA Environmentally Superior Alternative*, for a summary of the EIR conclusions supporting that determination). Additionally, as discussed in Section 4.12, *Wetlands* of the Final EIR, the existing degraded wetland habitat would continue to be subject to long-term operations and maintenance activities in compliance with Title 14, CFR Part 139, even if Alternative D were not implemented at LAX. This long-term maintenance would result in the permanent loss of habitat value and functions normally associated with wetlands.

Under the third of the three-part test, according to the USFWS Biological Opinion (FWS-OR-1012.5) for the Los Angeles International Airport Master Plan, implementation of mitigation measure MM-ET-1, Riverside Fairy Shrimp Habitat Restoration, in Section 4.11 of the Final EIR, would provide for the replacement of 0.04 acre (1,853 square feet) of degraded wetland habitat with estimated habitat value of 0.15 with 0.12 acres (5,559 square feet, as determined by a 3:1 mitigation ratio) of created vernal pool habitat with an anticipated

habitat value of 0.75. In addition, the potential indirect affects to 1.26 acres of jurisdictional wetlands would be avoided through implementation of construction avoidance measures described in MM-ET-1, in Section 4.11 of the Final EIR.

Mitigation measure MM-ET-1 has been recommended as part of the jurisdictional delineation submitted to the USACOE to fulfill the responsibilities of FAA and LAWA, pursuant to Section 404 of the Clean Water Act. As discussed in Section 4.11 of the Final EIR, with implementation of mitigation measure MM-ET-1, there would be no net loss of habitat functions or values.

Public Comment:

Several public comments were received relating to Alternative D's impacts to wetlands and the Riverside fairy shrimp cysts within the wetlands. Public comments focused on the need for long-term conservation programs for biological resources on airport lands, the need for appropriate Clean Water Act permits, mitigation ratios and exact locations, the feasibility of relocating Riverside fairy shrimp to the West Bluff of the Ballona Wetland ecosystem, and the coordination of mitigation for the western spadefoot toad, wetland habitat, and the Riverside fairy shrimp.

As discussed in Section 4.12 of the Final EIR, FAA will be responsible for complying with all regulatory requirements pertaining to wetland fill and will be responsible for preparing a Final Endangered Species Conservation Plan for submittal to the USFWS detailing off-site relocation efforts for the Riverside fairy shrimp as well as protocols for monitoring and maintaining the relocation site(s). LAWA and FAA intend to relocate the existing Riverside fairy shrimp and western spadefoot toad species, at a ratio of 3:1, to an existing vernal pool complex to Marine Corps Air Station at El Toro. This site has been selected over the West Bluff site because land at El Toro is already owned by FAA; the West Bluff site was eliminated because of high costs associated with acquiring the property.

Article 5, Land Resources

§30240 Environmentally sensitive habitat areas; adjacent developments

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

Comment and Analysis:

Existing Coastal Sensitive Habitat

As discussed in Section 4.10, *Biotic Communities* of the Final EIR, the area that lies within the airport study area comprises approximately 4,260 acres, which supports six generally

designated open areas that make up the affected environment. These open areas feature the following biotic communities:

- (1) The El Segundo Blue Butterfly Habitat Restoration Area (Habitat Restoration Area) located to the west of the airfield, comprised of approximately 202.8 acres. Four biotic communities are represented: Southern Foredune (135.6 acres), Southern Dune Scrub (24.4 acres), Valley Needlegrass Grassland (17.1 acres), and Developed (25.7 acres).
- (2) Approximately 104.3 acres of non-restructured dunes adjacent to and north of the Habitat Restoration Area, comprised of three biotic communities: Disturbed Dune Scrub/Foredune (74.6 acres), Non-Native Grassland/Ruderal (16.9 acres), and Developed (12.8 acres).
- (3) Westchester Southside, comprised of three biotic communities: Landscaped (60.55 acres), Disturbed/Bare Ground (4.87 acres), and Non-Native Grassland/Ruderal (124.28 acres).
- (4) A 40.85-acre area on the east side of the airport, which is comprised of one biotic community, Non-Native Grassland/Ruderal.
- (5) Open space fragments, totaling approximately 676.37 acres, located within the airfield, comprised of three biotic communities: Non-Native Grassland/Ruderal (553.12 acres), Disturbed/Bare Ground (103.1 acres), and Landscaped (20.15 acres).
- (6) Open space located in the southeast corner, known as Continental City, of approximately 24.68 acres, which is comprised of one biotic community, Disturbed/Bare Ground.

The largest of the open-space parcels within the study area is the Los Angeles/El Segundo Dunes, the largest extant remnant of one of five major sand dune complexes that historically occurred in California south of San Francisco. Within the study area, there are approximately 307 acres of dunes and related landforms, 202.8 acres of which are designated as the Habitat Restoration Area. An additional 104.3 acres of dunes and adjacent landforms lie to the north of the Habitat Restoration Area.

As discussed in Section 4.10 and Section 4.11, *Endangered and Threatened Species of Flora and Fauna* of the Final EIR, the Habitat Restoration Area is home to the federally listed El Segundo blue butterfly. LAWA's habitat conservation and restoration efforts were initiated in 1987 and have received national attention. LAWA, in coordination with U.S. Fish and Wildlife and the California Department of Fish and Game, has provided and continues to provide the resources necessary for the habitat conservation and restoration efforts. The Habitat Restoration Area is the largest remaining representation of coastal dune community within Los Angeles. Since its initiation, ecological restoration has extended the distribution of its constituent plant communities to approximately 202.8 acres.

As discussed in Section 4.11 of the Final EIR, there are 20 sensitive plant species designated by federal or state agencies that were determined to have the potential to be present within the study area. Surveys conducted for sensitive plant species identified three of these species within the study area. Surveys identified 9,051 individuals of Lewis' evening primrose within the Habitat Restoration Area and an additional 300 individuals within the airfield. The El Segundo duneflower was also present within the Habitat

Restoration Area, with an extremely small population of only three individuals. The California spineflower was also located in eight areas within the Habitat Restoration Area; 572 individuals were found. Seventeen sensitive plant species were determined absent within the study area.

As discussed in Section 4.11 of the Final EIR, there were 34 sensitive wildlife species designated by federal or state agencies that were determined to have the potential to occur within the study area; 24 of these species were identified within the study area. There are 18 sensitive arthropods, 14 sensitive insect species and four sensitive arachnids, all of which were located within the Los Angeles/EI Segundo Dunes. The western spadefoot toad was determined present in ephemeral ponds in the south airfield. Two sensitive reptiles, the silvery legless lizard and the San Diego horned lizard, were determined present within the Los Angeles/EI Segundo Dunes. Two sensitive bird species, the burrowing owl and the loggerhead shrike, were detected in the Los Angeles/EI Segundo Dunes. The only sensitive mammal present in the study area is the San Diego black-tailed jackrabbit, which utilizes the open space area located within the southwestern corner of the airfield.

Eight biotic communities have been identified within the study area, as discussed in As discussed in Section 4.10 of the Final EIR. The biotic communities and vegetation types found within the study area are discussed in detail below.

Southern Foredune: Southern Foredune plant communities are typically dominated by perennial species with a high proportion of suffrutescent (slightly woody at base) plants up to 30 cm tall. The Southern Foredune community is inhabited by a number of wildlife species, including the federally-listed EI Segundo blue butterfly.

Within the study area, 135.6 acres of this community are found within the Habitat Restoration Area west of Pershing Drive. Relatively undisturbed areas (about 40 acres) surrounding the Very High Omni Range Navigation Beacon provide the most representative example of this community. Ecological restoration efforts undertaken between 1987 and 1994 have restored an additional 95.6 acres. The host plant and primary food source for the EI Segundo blue butterfly, coast buckwheat, is found in this biotic community.

Southern Dune Scrub: Southern Dune Scrub is a dense coastal scrub community of scattered shrubs, subshrubs, and herbs, generally less than 1 meter in height, often developing considerable cover, and often succulent. Along the coast, Southern Dune Scrub intergrades with the Southern Foredune plant community.

The Los Angeles/EI Segundo Dunes contain virtually the only remaining example of this plant community in mainland Southern California. Within the study area, the Southern Dune Scrub community is found only within the Habitat Restoration Area along the steep slope of the backdune and is comprised of 24.4 acres. The host plant and primary food source for the EI Segundo blue butterfly, coast buckwheat, is found in this biotic community.

Valley Needlegrass Grassland: The deflation plain east of the backdune consists of loosely consolidated (incipient) sandstone covered to variable depths with aeolian (wind-transported) sand. Many common species of birds and two reptiles are known to utilize this biotic community.

This biotic community has been significantly altered and degraded by development activities. The floral components typically associated with it are now almost completely absent due to extensive grading and paving and the invasion of exotic annual grasses. No vernal pools exist today. The Valley Needlegrass Grassland community occupies 17.1 acres within the Habitat Restoration Area, and is limited to three distinct areas adjacent to and west of Pershing Drive.

Disturbed Dune Scrub/Foredune: This community is made up of 74.6 acres and is located north of the Habitat Restoration Area, south of Waterview Street, west of Pershing Drive, east of Vista del Mar Boulevard, and is bisected by Sandpiper Street. This biotic community is heavily disturbed and is dominated by invasive species that drive out native vegetation. The few coastal dune elements are patchy and include burbush, dunes evening primrose, bush lupine, pink sand verbena, and deerweed. Coast buckwheat is absent from this site.

Non-Native Grassland: Non-Native Grassland/Ruderal areas are those that have been subjected to past disturbance. This biotic community is comprised of 721.8 acres and is heavily fragmented throughout the study area. It includes a portion of the Los Angeles/El Segundo Dunes that was once a residential area, and areas along the northern perimeter of the study area that were also historically residential. This biotic community is also represented between the runways and taxiways on the airfield, which undergoes regular operations maintenance and is routinely mowed.

Disturbed/Bare Ground: This biotic community is dominated by bare ground and is comprised of approximately 103.1 acres. It is represented in several areas: north of the airfield between Westchester Parkway and Argo Ditch; an area between the Habitat Restoration Area and the remote terminal area of the airport; the area known as Continental City; and two isolated areas along the southern perimeter of the study area adjacent to Imperial Highway.

Landscaped: Areas within the study area that support landscaped vegetation, totaling 79.2 acres, include a golf course located within the northern boundary, a small park located in the northeast sector, and most roadway medians.

Developed: Developed areas within the study area occupy 2644.9 acres and include the airfield, terminals, parking, roads, and support facilities.

Direct Affects from Alternative D

Under Alternative D, construction of navigational aids and associated service roads would result in impacts to 66,675 square feet (1.53 acres) of state-designated sensitive habitat within the Los Angeles/El Segundo Dunes. Within this area, 10,597 square feet (0.24 acre) of habitat occupied by the El Segundo blue butterfly would be impacted.

As discussed in Section 4.11 of the Final EIR, one sensitive plant species, Lewis' evening primrose, is widely distributed within the Habitat Restoration Area of the Los Angeles/El Segundo Dunes. The Lewis' evening primrose is designated by the CDFG as a state sensitive species. Implementation of Alternative D would potentially result in the loss of individuals from installation of navigational aids and associated service roads within the Habitat Restoration Area.

As also discussed in Section 4.11 implementation of Alternative D also would result in impacts to:

- Approximately 66,675 square feet (1.53 acres) of state-designated sensitive habitat that support sensitive arthropods, the silvery legless lizard, the San Diego horned lizard, and the burrowing owl would be affected.
- Loss of the existing western spadefoot toad population that currently inhabits 2.01 acres of Disturbed/Bare Ground and 6.96 acres of Non-Native Grassland/Ruderal within the southwestern portion of the Airport Operations Area (AOA) would occur. The western spadefoot toad is designated by CDFG as a Species of Special Concern.
- Loss of San Diego black-tailed jackrabbit individuals and their habitat within the southwest AOA consisting of 23.76 acres of Disturbed/Bare Ground would occur. The San Diego black-tailed jackrabbit is designated by CDFG as a Species of Special Concern. This species would be adversely affected through habitat modification, which is a CEQA threshold of significance.
- Displacement of loggerhead shrike and the loss of 49.97 acres of habitat consisting of Non-Native Grassland/Ruderal and 33.287 acres of Disturbed/Bare Ground communities would occur. The loggerhead shrike is designated by CDFG as a Species of Special Concern. This species would be adversely affected through habitat modification.
- The removal of approximately 300 mature utilized by raptors for nursery sites would occur.

Implementation of mitigation measures MM-BC-1, MM-BC-2, MM-BC-3, MM-BC-8, MM-BC-9, and MM-BC-13, included in Section 4.10, Biotic Communities of the Final EIR, would reduce all direct impacts to these biotic resources within the Los Angeles/El Segundo Dunes and the coastal zone to less than significant levels.

Indirect Affects from Alternative D

As discussed in As discussed in Section 4.11 of the Final EIR, there Section 4.10, Biotic Communities, of the Final EIR, implementation of Alternative D would not result in significant indirect air quality impacts to biotic communities due to the prevailing wind conditions and the location of peak concentrations of air pollutants within the eastern portion of the airport. However, according to both Section 4.10 and Section 4.11 construction activities, including staging and stockpiling of materials proximal to the Los Angeles/El Segundo Dunes and the Habitat Restoration Area have the potential to result in deposition of fugitive dust within state-designated sensitive habitats. Implementation of mitigation measures MM-BC-1 included in Section 4.10 and MM-ET-3 included in Section 4.11 of the Final EIR, and the construction avoidance measures discussed within these mitigation measures, would reduce impacts to this sensitive coastal zone habitat to less than significant levels.

As discussed in Section 4.18, Light Emissions of the Final EIR, levels of ambient lighting in the Habitat Restoration Area are expected to increase by approximately 0.34 foot-candles (*fc*) or less due to the development of the parking facility. The increase in ambient light levels of approximately 0.34 *fc*, and changes in navigational aid light are not anticipated to have significant impacts on biotic communities. As indicated in FAA's consistency

determination, Alternative D would also change navigational aid lighting in the Los Angeles/El Segundo Dunes, including the Habitat Restoration Area. The increase in ambient light levels of 0.34 *fc* and changes in navigational aid lighting (with implementation of Master Plan Commitment LI-3 included in Section 4.18, Light Emissions of the Final EIR) are not expected to have significant impacts on biotic communities, including sensitive floral and faunal species, in the Dunes.

As discussed in Section 4.11 of the Final EIR there is no increase in L_{max} , under Alternative D compared to 1996 baseline conditions. All three noise metrics decrease when compared to the 1996 environmental baseline; therefore, implementation of Alternative D would not result in significant impacts from noise to sensitive wildlife species in the coastal zone.

Public Comment:

Numerous public comments were received regarding direct and indirect impacts to sensitive habitat and species within the Los Angeles/El Segundo Dunes and the coastal zone. Public comments regarding direct impacts to the coastal zone primarily raised concerns and clarifications about what development is planned in the Dunes area west of LAX. As discussed in Section 4.14, Coastal Zone Management and Coastal Barriers, the only development planned in the Dunes is the relocation of existing navigational aids and associated service roads for runway 6R/24L. No hotels or golf course developments in the Dunes are proposed by, or allowed under, the LAX Master Plan.

Several public comments were received regarding impacts to coast buckwheat and the El Segundo blue butterfly in the Los Angeles/El Segundo Dunes and Habitat Restoration Area from relocating the existing navigational aids. Comments regarding the adequacy of mitigation measure MM-ET-4, included in Section 4.11 of the Final EIR, and the geographic distribution of the navigational aids and service roads questioned the ability to successfully minimize impacts to 1.53 acres in the Dunes. As discussed in Section 4.11 of the Final EIR, and within the USFWS's Biological Opinion, LAWA's ongoing and expanded restoration enhancement and maintenance efforts would successfully avoid and/or mitigate impacts to the coast buckwheat and El Segundo blue butterfly.

Comments also were received regarding indirect impacts to sensitive habitat and species. Indirect impacts of concern to commentors included impacts associated with light emissions, noise, air quality, and viability of mitigation measures. Issues of concern related to light emissions included the spatial distribution and intensity of light emission increases throughout the Dunes and the implications on increased predation and/or competition among species. According to Sections 4.10, Section 4.11, and Section 4.18 of the Final EIR, no evidence has shown increased predation or competition, or detrimental effects associated with increased illumination, among the species in the Dunes adjacent to LAX.

Comments received regarding noise impacts on species such as the loggerhead shrike, western spadefoot toad, San Diego horned lizard, silvery legless lizard, burrowing owl, and black-tailed jackrabbit dealt with concerns about physical, nesting and breeding impacts resulting from excess noise levels from overhead aircraft. As discussed in Section 4.11 of the Final EIR, no evidence shows that species are suffering from noise impacts in the coastal zone surrounding LAX. Species that are affected by excessive noise levels are not located within areas where L_{max} levels exceed the individual species' tolerance levels. The

only bird species found to be located within the Dunes is the loggerhead shrike, and noise levels have not affected the nesting and breeding productivity of this bird.

Comments received regarding air quality impacts to habitat within the Dunes demonstrated concern over the deposition of soot and particles from cars and aircraft. As discussed in Section 4.10 of the Final EIR, implementation of Alternative D would not result in potentially significant air quality impacts to biotic communities due to the prevailing wind conditions and the location of peak concentrations of air pollutants within the eastern portion of the airport.

Several comments were received regarding the adequacy of mitigation measures included of the Final EIR for sensitive habitat and species at LAX. Mitigation measures of concern dealt with western spadefoot toad habitat, loss of the geographic range for the western spadefoot toad species, enhancing the Dunes for loggerhead shrike and its affect on the Jerusalem cricket, enhancing habitat north of the Habitat Restoration Area for the black-tailed jackrabbit, mitigation for the Lewis' evening primrose, and the timing of mitigation for the El Segundo blue butterfly. Mitigation measures included in Section 4.10 and Section 4.11 of the Final EIR, were developed in consultation with the CDFG and the USFWS. Implementation of these agreed-upon mitigation measures would reduce impacts to these sensitive habitat and species, located within the coastal zone, to less than significant levels.

Article 6, Development

§30252 Maintenance and enhancement of public access

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

Comment and Analysis:

Existing Coastal Access

As discussed in Section 4.14, Coastal Zone Management and Coastal Barriers of the Final EIR, currently access to the coast near LAX, which is mainly provided at Dockweiler State Beach, can be accomplished via vehicle, bicycle, or on foot.

Vehicular access to the coast in the vicinity of LAX is provided via Westchester Parkway to Pershing Drive to various residential streets. Sandpiper Street (which connects Pershing Drive and Vista del Mar) no longer provides vehicular access to the coast as it has been closed for security purposes following the events of September 11, 2001. Vehicular access to the coast is also provided via Imperial Highway along the southern perimeter of LAX. Farther south, within the City of El Segundo, coastal access is provided by Grand Avenue.

Currently, residents of El Segundo can access Imperial Highway from two access points: Main Street and California Street. Vehicles can proceed westbound to the coast or eastbound on Imperial Highway from either of these streets. Parking is available at Dockweiler State Beach and along Vista del Mar.

Bicycle access is provided by a network of bicycle lanes and bicycle paths, which is shown in Figure F4.14-4, Existing and Proposed Bicycle Access in the LAX Vicinity, in the Final EIR. A Class I bicycle path, which provides exclusive bicycle rights-of-way separate from vehicular traffic, is located along the coast between Vista del Mar and the Pacific Ocean from north of LAX near Marina del Rey to Grand Avenue south of LAX. Although Vista del Mar is not a designated bicycle route, bicyclists can ride on the shoulder of the street parallel to the coast. Access to the coastal bicycle path is available via bicycle lanes on Grand Avenue and Imperial Highway. The bicycle lane on Imperial Highway extends from east of Aviation Boulevard to Vista del Mar. There are also bicycle lanes on Westchester Parkway along the northern boundary of LAX. Bicyclists can access the coast by traveling westbound along Westchester Parkway to Pershing Drive and, from Pershing, connecting with various residential streets near the terminus of Westchester Parkway.

Currently, pedestrian access to the coast in the immediate vicinity of LAX is limited. Within the City of El Segundo, pedestrian access is provided by a footpath connecting Imperial Avenue with Imperial Highway near Hillcrest Street. Sidewalks are available intermittently along the south side of Imperial Highway; pedestrians can walk along the shoulder of the roadway where there are no sidewalks. Within the northern portion of LAX, there are sidewalks along Westchester Parkway, but there are no connecting sidewalks along Pershing Drive.

Coastal Access Under Alternative D

As discussed in Section 4.14, Coastal Zone Management and Coastal Barriers of the Final EIR, because Alternative D would not shift the airport's primary passenger activity center closer to the coast, there would be limited impact to existing coastal access.

Under Alternative D, all of existing coastal access routes would remain in their baseline configurations. The only components of Alternative D that would be nearby or en route to the coast are the LAX Northside development and the west employee parking garage on World Way West. However, neither of these developments would alter the existing coastal access routes, although they would increase the number of vehicles on roadways that provide access to the coast.

Alternative D would not alter existing bicycle access to the coast. In addition, under Master Plan Commitment LU-5, included in Section 4.2, Land Use of the Final EIR, LAWA would comply with municipal bicycle policies and plans, including the City of Los Angeles Transportation Element Bicycle Plan, and would provide maximum feasible incorporation of bike paths and lanes into the Master Plan circulation systems. In addition, bicycle access and parking facilities would be provided at the GTC, ITC, and major parking lots. Related facilities, such as lockers and showers, would also be provided where feasible to promote employee bicycle use.

As discussed in Section 4.14 pedestrian access to the coast would continue to be limited under Alternative D. The existing footpath connecting Imperial Avenue and Imperial

Highway would not be affected under this alternative. However, the proposed changes in ground access to LAX do not include the provision of new sidewalks. Sidewalks are not currently available along the full length of Imperial Highway under baseline conditions. Pedestrians would continue to be able to walk along the shoulder of Imperial Highway to the coast.

Vehicle, bicycle, and pedestrian access to the coast is not expected to be significantly affected by construction activities associated with Alternative D. Any impact to coastal access along Westchester Parkway, Pershing Drive, and Imperial Highway is expected to be minimal. In addition, alternative coastal access would be available.

Employee Parking Structure Access

Employee parking would be provided in a new 12,400-stall garage on the west side of the airport, south of World Way West. As detailed in Table F4.3.2-30, Off-Airport Surface Transportation Phasing Plan, included in Section 4.3.2, Off-Airport Surface Transportation of the Final EIR, construction of the new west employee parking structure would be accompanied by number other off-site improvements. These are listed below:

- Complete off-site intersectional improvements at:
 - Grand Avenue and Vista del Mar
 - Highland Avenue/Vista del Mar and Rosecrans Boulevard
 - Imperial Highway and Main Street
 - Imperial Highway and Pershing Drive
 - Imperial Highway and Sepulveda Boulevard
 - Imperial Highway and Vista del Mar
 - Jefferson Boulevard and Lincoln Boulevard
 - Lincoln Boulevard and Manchester Avenue
 - Lincoln Boulevard and Teale Street
 - Rosecrans Avenue and Sepulveda Boulevard
 - 83rd Street and Lincoln Boulevard;

- Provide a fair-share contribution to LA County's "Marina Expressway to Admiralty Way" project OR complete alternative off-site intersectional improvements at the following intersections:
 - Bali Way and Lincoln Boulevard
 - Fiji Way and Lincoln Boulevard
 - Lincoln Boulevard and Marina Expressway
 - Lincoln Boulevard and Maxella Avenue
 - Lincoln Boulevard and Mindanao Way
 - Lincoln Boulevard and Washington Boulevard

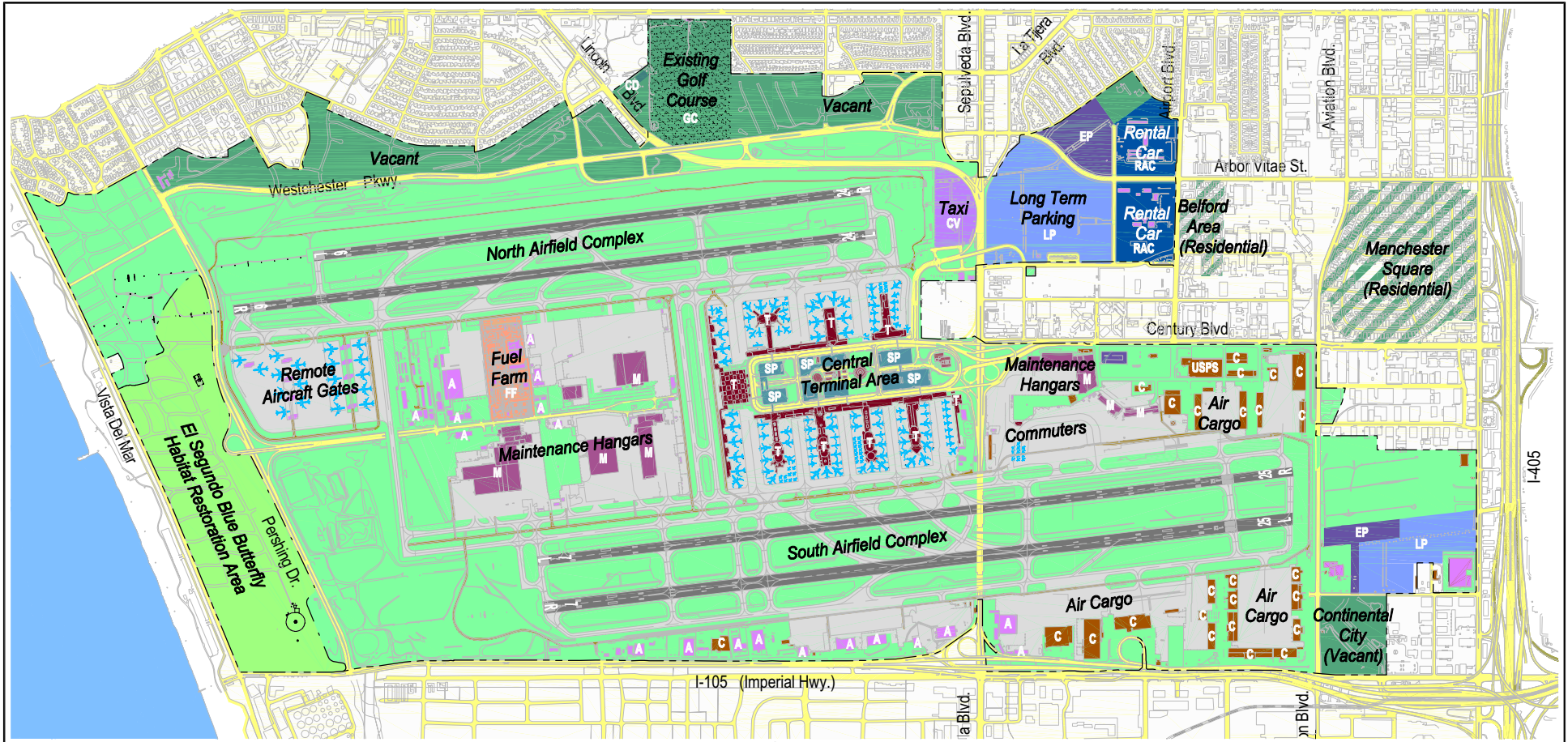
- Provide a fair-share contribution toward the LAC-MTA's Metro Rapid Bus Line Expansion Program (possible concepts include but are not limited to paying for larger or additional buses from those planned by the LAC-MTA or paying the cost of retrofitting some buses to better accommodate airline passengers and their baggage to and from LAX) OR other enhancements to benefit transit to and from LAX (possible concepts include but are not limited to traffic signal priority improvements for bus flow, transit marketing, airport employee and/or air passenger fare subsidies) to mitigate the following intersections:
 - Imperial Highway and Sepulveda Boulevard
 - Jefferson Boulevard and Lincoln Boulevard
 - Lincoln Boulevard and Manchester Avenue
 - Lincoln Boulevard and Marina Expressway
 - Lincoln Boulevard and Teale Street
 - Lincoln Boulevard and Washington Boulevard

As discussed in Section 4.2, Land Use, Section 4.3.2 Off-Airport Surface Transportation and Section 4.14, Coastal Zone Management and Coastal Barriers of the Final EIR, implementation of Alternative D would not impose any public access burdens to coastal areas, and with the implementation of Master Plan Commitment LU-5, included in Section 4.2, and the west employee parking structure construction phasing plan outlined in Section 4.3.2, no mitigation is required to reduce impacts to the public's access to the coast.

Public Comment:

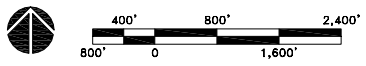
Public comments related to coastal access were received from representatives from Culver City, the California Coastal Commission, and the City of Los Angeles. These comments raised issues associated with increased traffic volumes on Vista del Mar, effects to coastal access and recreation due to increased traffic, roadway improvements to maintain and enhance coastal access, the continued presence of bicycle lanes along roads providing coastal access, and the timing of traffic counts to take summer peak traffic volumes into consideration.

Responses to these comments directed commentors to coastal access discussions included in Section 4.3.2, Off-Airport Surface Transportation, Section 4.4.4, Community Disruption, and Section 4.14, Coastal Access, in the EIS/EIR. Analysis in these sections shows that no significant impacts to coastal access would occur with implementation of Alternative D.



LEGEND

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|--|---------------------------------|-----------------------------------|
| Airfield/Airport Open Space | Cargo Buildings | Long-Term Public Parking |
| El Segundo Blue Butterfly Habitat Restoration Area | Maintenance Facilities | Short-Term Public Parking |
| Runways | Ancillary Facilities | Rental Car Facility |
| Taxiways/Aircraft Aprons | Fuel Farm | Golf Course/Open Space/Recreation |
| Roadways | Commercial Vehicle Holding Area | Residential ANMP Acquisition Area |
| Terminal Buildings | Employee Parking | Light Rail Transit |
| | Collateral Development | Navigational Aids |

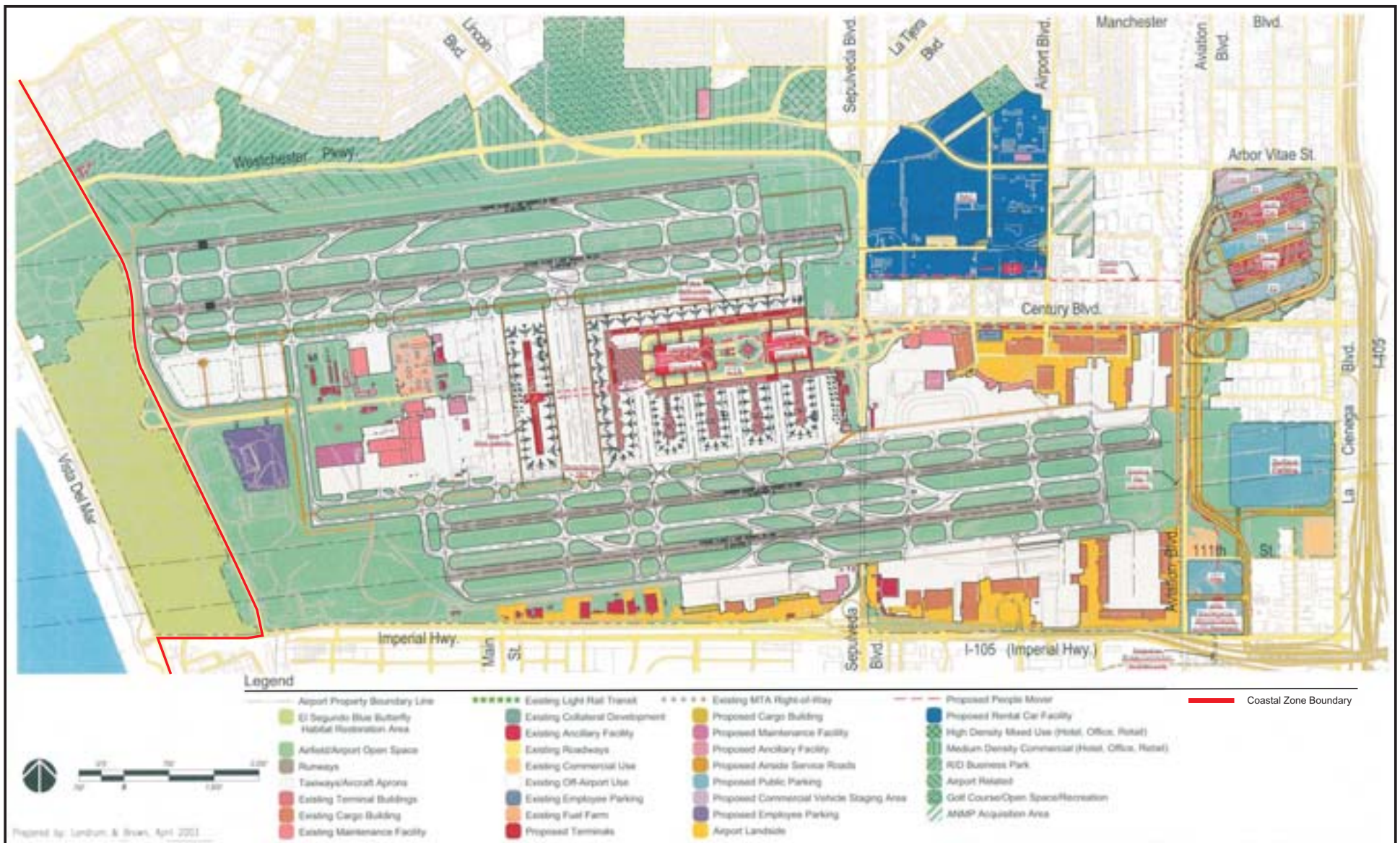


Prepared by: Landrum & Brown, March 2004

LAX Master Plan

Existing Conditions 1997

Figure 1



LAX Master Plan

Alternative D - 2015 Enhanced Safety and Security Plan

Figure 2

