

ATTACHMENT 7

LOS ANGELES CITY

DEPARTMENT OF TRANSPORTATION

RESPONSE LETTER

CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

Date: November 6, 2013

To: Cynthia Guidry, Chief of Airport Planning II
Los Angeles World Airports

From:  Jaime de la Vega, General Manager
Department of Transportation

Subject: **LAX WEST AIRCRAFT MAINTENANCE AREA (WAMA) PROJECT –
LADOT REVIEW**

The Los Angeles Department of Transportation (LADOT) has completed its review of the traffic impact analysis completed for the Los Angeles International Airport (LAX) West Aircraft Maintenance Area (WAMA) Project – Draft Environmental Impact Review (DEIR) and have determined the analysis to be complete and appropriate.

Inasmuch as the purpose of the proposed project is to consolidate and modernize existing LAWA facilities, there is no new project traffic anticipated to be generated other than temporary construction traffic. The review of the construction traffic has concluded that there are not significant impacts that would need to be addressed and thus there are no project specific mitigation measures required for the project. However, as stated in the Draft EIR report, the project is responsible for adhering to all applicable LAX Master Plan commitments and mitigation measures and has identified each of these measures in Section 4.7.7 of the report. Therefore, since the traffic impact analysis is centered solely on the construction traffic that is anticipated to be generated by the project, it is LADOT recommendation that LAWA assign specific direction that requires the project to contact the LADOT Western District Operations officer in order to obtain final LADOT clearance on all construction traffic mitigation commitments.

A copy of the Draft EIR Section 4.7.7, Applicable LAX Master Plan Commitments and Mitigation Measures excerpt, is attached for reference.

If you should have any questions, please contact Eddie Guerrero, of our West L.A./Coastal Planning office, at (213) 485-1062.

RA/EG:dh

Attachment

c: Jay Kim, Sean Haeri, Rudy Guevara, LADOT
Steve Martin, Lisa Trifiletti, Evelyn Quintanilla, LAWA

4.7 Construction Surface Transportation

in LOS is compared to the thresholds identified earlier in this section to determine if the proposed Project would result in a significant impact.

- **Cumulative Impacts**--The cumulative impacts analysis is intended to provide a comparison of future traffic conditions, consisting of traffic generated by all anticipated sources described previously in this document. Cumulative impacts were analyzed using a two-step process. Initially, the cumulative "With Project" LOS condition was compared with the baseline condition to determine if a cumulative impact would occur relative to the baseline. A cumulative impact was deemed significant if it exceeded the allowable threshold of significance defined earlier in this section. If a cumulative impact was determined, then a second comparison was conducted by calculating the difference in LOS for the "With Project" and "Without Project" levels of service to determine the proposed Project's contribution. If the calculated differences in LOS exceed the threshold guidelines defined in this section, then it was determined that the proposed Project component would represent a cumulatively considerable contribution (significant impact).

4.7.7 Applicable LAX Master Plan Commitments and Mitigation Measures

The following transportation-related commitments identified in the LAX Master Plan MMRP would be applied to the proposed Project and thus are included as part of the proposed Project for purposes of environmental review:

C-1. Establishment of a Ground Transportation/Construction Coordination Office.

- Establish this office for the life of the construction projects to coordinate deliveries, monitor traffic conditions, advise motorists and those making deliveries about detours and congested areas, and monitor and enforce delivery times and routes. LAWA would periodically analyze traffic conditions on designated routes during construction to see whether there is a need to improve conditions through signage and other means.

This office may undertake a variety of duties, including but not limited to:

- Inform motorists about detours and congestion by use of static signs, changeable message signs, media announcements, airport website, etc.;
- Work with airport police and the Los Angeles Police Department to enforce delivery times and routes;
- Establish staging areas;
- Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
- Coordinate roadway projects of Caltrans, City of Los Angeles, and other jurisdictions with those of the Airport construction projects;
- Monitor and coordinate deliveries;
- Establish detour routes;
- Work with residential and commercial neighbors to address their concerns regarding construction activity; and
- Analyze traffic conditions to determine the need for additional traffic controls, lane restriping, signal modifications, etc.

4.7 Construction Surface Transportation

Note: Subsequent to the approval of the LAX Master Plan, LAWA established a "Ground Transportation/Construction Coordination Office" in the form of the CALM team. The CALM team coordinates and monitors construction traffic, coordinates with agencies as necessary, and reviews traffic control plans to address any concerns prior to approval. The CALM team, discussed in detail in Section 4.7.3.8, above, provides implementation of the LAX Master Plan Commitment C-1.

C-2. Construction Personnel Airport Orientation.

- All construction personnel will be required to attend an airport project-specific orientation (pre-construction meeting) that includes where to park, where staging areas are located, construction policies, etc.

ST-9. Construction Deliveries.

- Construction deliveries requiring lane closures shall receive prior approval from the Construction Coordination Office. Notification of deliveries shall be made with sufficient time to allow for any modifications to approved traffic detour plans.

ST-12. Designated Truck Delivery Hours.

- Truck deliveries shall be encouraged to use night-time hours and shall avoid the peak periods of 7:00 AM to 9:00 AM and 4:30 PM to 6:30 PM.

[Note: This measure provides guidelines for controlling the arrival and departure times of construction-related truck traffic during peak commute periods, and served as input for developing an estimated schedule of the proposed Project construction delivery activity.]

ST-14. Construction Employee Shift Hours.

- Shift hours that do not coincide with the heaviest commuter traffic periods (7:00 AM to 9:00 AM, 4:30 PM to 6:30 PM) would be established. Work periods will be extended to include weekends and multiple work shifts, to the extent possible and necessary.

[Note: This measure provides guidelines for controlling the arrival and departure times of construction employees, and served as direct input for determining the employee traffic activity associated with the proposed Project. Traffic analysis was limited to weekday traffic conditions to provide a conservative estimate of potential impacts given that weekday traffic activity is typically significantly higher than during the weekend traffic.]

ST-16. Designated Haul Routes.

- Every effort will be made to ensure that haul routes are located away from sensitive noise receptors.

ST-17. Maintenance of Haul Routes.

- Haul routes on off-airport roadways will be maintained periodically and will comply with City of Los Angeles or other appropriate jurisdictional requirements for maintenance. Minor striping, lane configurations, and signal phasing modifications would be provided as needed.

ST-18. Construction Traffic Management Plan.

- A complete construction traffic plan will be developed to designate detour and/or haul routes, variable message and other sign locations, communication methods with airport

4.7 Construction Surface Transportation

passengers, construction deliveries, construction employee shift hours, construction employee parking locations and other relevant factors.

ST-22. Designated Truck Routes.

- For dirt and aggregate and all other materials and equipment, truck deliveries will be on designated routes only (freeways and non-residential streets). Every effort will be made for routes to avoid residential frontages. The designated routes on City of Los Angeles streets are subject to approval by LADOT's Bureau of Traffic Management and may include, but will not necessarily be limited to: Pershing Drive (Westchester Parkway to Imperial Highway); Florence Avenue (Aviation Boulevard to I-405); Manchester Boulevard (Aviation Boulevard to I-405); Aviation Boulevard (Manchester Avenue to Imperial Highway); Westchester Parkway/Arbor Vitae Street (Pershing Drive to I-405); Century Boulevard (Sepulveda Boulevard to I-405); Imperial Highway (Pershing Drive to I-405); La Cienega Boulevard (north of Imperial Highway); Airport Boulevard (Arbor Vitae Street to Century Boulevard); Sepulveda Boulevard (Westchester Parkway to Imperial Highway); I-405; and I-105.

4.7.8 Impact Analysis

4.7.8.1 Impact Comparison 1: Baseline Plus Project Traffic Measured Against Baseline

This comparison provides the basis for determining Project-related impacts. The comparison is based on Project-specific traffic generation during the peak construction period (August 2014) added to baseline traffic volumes. The resulting levels of service were compared to the levels of service associated with the baseline condition. A significant impact would be realized if/when the thresholds of significance are met or exceeded. Impact comparisons between the proposed Project's peak traffic added to the baseline compared to the baseline alone is depicted in Table 4.7-8. As shown in Table 4.7-8, it is anticipated that no significant impacts would occur during August 2014 under the proposed Project.

4.7.8.2 Impact Comparison 2: Cumulative Traffic (March 2018) Measured against Baseline

This comparison was conducted in two steps, which is consistent with *CEQA Guidelines* Section 15130. An initial comparison was conducted by comparing the LOS associated with peak future cumulative traffic volumes (including the proposed Project, other cumulative projects and ambient growth in background traffic), to the baseline levels of service from 2013. This initial comparison of future cumulative conditions to baseline 2013 conditions was conducted to determine if there would be a significant cumulative impact. If a significant cumulative impact was determined, then an additional comparison was conducted to determine if the proposed Project's share of the significant impact would be considered a cumulatively considerable contribution to the significant cumulative impact. This second comparison was conducted by comparing future cumulative conditions both with and without the proposed Project. Cumulatively considerable contributions are realized when the thresholds of significance defined above are met or exceeded. The impact comparison for this condition is depicted in Table 4.7-9.