REPORT

DATE: 10/10/03

TO: Transportation and Communications Committee

FROM: Michael Armstrong, Lead Regional Planner
213-26-1914/armstron@scag.ca.gov

SUBJECT: Comments on Supplement to Draft LAX Master Plan EIS/EIR and Master Plan Addendum

EXECUTIVE DIRECTOR'S APPROVAL:

RECOMMENDED ACTION: Approve Comments for transmittal to Los Angeles World Airports

BACKGROUND: Comments were prepared on the Draft EIS/EIR and Master Plan Addendum for the LAX master alternative "D" in light of adopted regional transportation policy, and the proposed strategy of the Preferred Regional Aviation Plan developed for the Draft 2004 Regional Transportation Plan.

FISCAL IMPACT: None

October 7, 2003

Mr. Jim Ritchie
Deputy Executive Director
Los Angeles World Airports
P. O. Box 92216
Los Angeles, CA 90009-2216

Re: **Comments on Supplement to Draft Los Angeles International Airport Master Plan Environmental Impact Statement/Environmental Impact Report and Master Plan Addendum**

Dear Mr. Ritchie:

Thank you for submitting the Supplement to Draft Los Angeles International Airport (LAX) Master Plan EIS/EIR and Master Plan Addendum to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG is a Joint Powers Agency established under California Government Code Section 6502. SCAG is designated as the Metropolitan Planning Organization (MPO) for the greater Los Angeles region including the Los Angeles International Airport service area. SCAG is also the designated Regional Transportation Planning Agency, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Plan (RTIP) under California Government Code Sections 65080 and 65082 respectively. In terms of project review, SCAG's mandated roles and responsibilities include, but are not limited to, the following:

- SCAG is the authorized regional agency for Inter-Governmental Review of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

- Pursuant to Public Resources Code Section 21083, SCAG reviews Environmental Impact Reports of projects of regional significance for consistency with regional plans {California Environmental Quality Act Guidelines Sections 15206 and 15125(b)}.

The Supplement to the Draft LAX Master Plan EIS/EIR and Master Plan Addendum meets SCAG's criteria for classification of a project that is regionally significant. The focus of our review is on the consistency of the project with adopted regional transportation policy, as well as new aviation strategies that have been developed as part of the agency's 2004 Draft RTP.

In general, Los Angeles World Airports (LAWA) is to be applauded for proposing a new LAX master plan alternative (Alternative D) that is generally consistent with SCAG's adopted passenger constraint for LAX of 78 million annual air passengers (MAP). We also commend the new alternative's emphasis on safety and security, and on increased transit usage to reduce airport ground access impacts.

Our comments our divided into comments on the Master Plan Addendum (i.e., project description of Alternative D), and comments on the Draft EIS/EIR. They pertain to adopted regional policy, as well as issues of regional concern that were previously reviewed by SCAG's Aviation Task Force, Transportation and Communications Committee and Regional Council. Some of the comments specifically relate to the Preferred Draft Regional Aviation Plan and implementation strategy that was approved for release as part of the Draft 2004 Regional Transportation Plan (RTP) by the Transportation and Communications Committee on October 2. We recognize that Alternative D was developed well before the Preferred Draft Regional Aviation Plan was approved. The comments that relate to our proposed new regional aviation strategy should be considered by LAWA in light of potential future consistency with the 2004 RTP, and opportunities to revise and supplement Alternative D to achieve this consistency. These comments contain recommendations for achieving consistency between the new LAX master plan alternative and SCAG's new Preferred Regional Aviation Plan.

A brief summary of SCAG staff comments includes the following: the Project should include an implementation mechanism to enforce its 78 million annual air passenger limitation; an explicit reference should be made to a potential future Maglev connection; a more proactive approach to implementing a regional aviation strategy should be described, incorporating elements of SCAG's recently issued Preferred Regional Aviation Plan; and cost and funding detail should be included for proposed off-airport ground access mitigation projects. The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this project. If you should have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

COMMENTS ON THE SUPPLEMENT TO THE DRAFT LOS ANGELES INTERNATIONAL AIRPORT MASTER PLAN ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT AND MASTER PLAN ADDENDUM SCAG NO.

A. COMMENTS ON THE LAX MASTER PLAN ADDENDUM/PROJECT DESCRIPTION

1. Consistency with 2001 Adopted Regional Aviation Plan

- **Consistency with adopted regional passenger and cargo forecasts:** Alternative D is designed to accommodate 78.9 million annual air passengers (MAP) and 3.1 million tons of air cargo within the forecast period extending to 2015. These figures are generally consistent with the adopted forecast for LAX of 78 MAP and 3.0 million tons of air cargo by 2025 in the adopted aviation plan in SCAG's 2001 Regional Transportation Plan, although slightly higher.
- **Implementation of Proposed Capacity Constraint:** The project proposes to maintain the passenger service at LAX to 78.9 MAP by extensively reconfiguring the existing passenger terminals and reducing the number of aircraft gates from the current 163 nominal gates to 153 nominal gates in Alternative D. However, the passenger carrying capacity of any particular terminal configuration cannot be exactly measured, since it is a function of the size of aircraft utilizing the gates and passenger load factors per aircraft. Also, remote aircraft parking positions would be eliminated by the alternative, which could always be reestablished as long as there is apron space to accommodate them. To maintain a 78 MAP constraint at LAX utilizing available gate capacity, an additional legally enforceable implementation mechanism would be needed. The mechanism would monitor passenger throughput at established gates, and adjust the number, size and configuration of gates as needed to keep total passenger activity within the 78 MAP limitation.
- **Consistency with adopted regional Maglev strategy:** A key element of the 2001 adopted aviation plan is a proposed regional high-speed rail network utilizing magnetic levitation (Maglev) technology. The proposed Maglev system is a vital component of the plan's decentralization strategy of distributing passengers and cargo to underutilized suburban airports in the Inland Empire and North Los Angeles County. It helps greatly to minimize the potential regional economic loss that could result from having highly constrained and encroached urban airports including LAX. The system forecasts a Maglev connection to LAX from West Los Angeles, with the segment running down the median of I-405 and turning west along I-105 to access LAX. The segment is planned for completion within the 2010 to 2015 time period, which is within the forecast period for the LAX master plan process. Alternative D makes no mention of a potential Maglev connection to LAX within the forecast period. However, it is much more conducive to such a connection than previously proposed master plan alternatives, by virtue of a proposed Intermodal Transfer Center (ITC) to be located north of Imperial Highway and the I-105 freeway, and east of Aviation Boulevard. The ITC will serve as a major transfer center for regional bus serve, and will be connected to a Green Line station located just south of Imperial Highway via an elevated walkway. The ITC is also a logic juncture for connecting with the SCAG's proposed Maglev segment that would follow the I-105 freeway alignment.

2. Regional Impact of LAX Master Plan Alternative D

- **Available regional airport capacity:** On page 1-12 of the Master Plan Addendum it should be noted that NAS Point Mugu is no longer available for possible joint use of that facility. On page 1-15 it should be noted that SCAG has updated its estimate of existing available capacity at existing urban air carrier airports in region (i.e., LAX, Burbank, John Wayne and Ontario airports) which totals about 131 MAP. This new figure reflects a recalculation of the runway capacity of Ontario Airport (to 30 MAP) and the recent renewal of John Wayne airport's settlement agreement from 8.4 MAP to 10.8 MAP.
- **Potential of Palmdale Airport:** On page 1-16, recent modeling of SCAG Preferred Aviation Plan for the 2004 Draft Regional Transportation Plan indicates that Palmdale Airport has the potential to serve a wide range of passenger demand, including international demand, given a high-speed Maglev connection and brokering/coordination between LAWA and airlines. Table 1.3-3 should be revised to indicate that Palmdale Airport has more service potential than just a commuter airport within the 2015 time period.
- **Secondary airports:** On page 1-17 it is stated that "A sensitivity analysis conducted by SCAG in 1998 found that if LAX capacity was constrained in an effort to force demand to other regional airports, much of the traffic would relocate to other airports outside the region such as San Francisco, Denver and Dallas rather than to secondary regional airports within the region." This sentence should be qualified by noting that more recent modeling conducted by SCAG with a regional Maglev system assumed indicates that Ontario and Palmdale airports both have the potential to serve long-haul and international demand, and absorb some of the potential loss of demand to airports outside the region.
- **Concentration of Travel Demand:** Figure 1.3-2, which shows the concentration of domestic O&D passenger demand throughout the region, appears to be in error. The figure shows that most of Orange County generates lower passenger demand per square mile than central Los Angeles County, which conflicts with SCAG regional demand data. The figure should be qualified by saying that it is based on partial data taken from LAX and Ontario O&D surveys.
- **Airline deregulation and competition:** On page 1-26, it should be noted that after the events of September 11, 2001, many passengers now find secondary airport to be much more convenient and easier to access than primary airports such as LAX. This is the primary reason why passenger growth at secondary airports in the region has largely rebounded over the last two years, as opposed to passenger levels at LAX.

3. Alternative D Development and Refinement

- **Design capacity of Alternative D:** On page 2-1 it is stated that "Alternative D would be designed to serve approximately 78 MAP, which is similar to the activity level in the scenario adopted by SCAG for LAX." It should be noted that the specific activity level that Alternative D would be designed for is 78.9 MAP, which is much closer to 79 MAP.
- **Regional approach of Alternative D:** On page 2-1 it is stated that Alternative D "would be developed to offer a regional development alternative to LAX." It is also stated that "The Alternative D design would encourage other airports in the region to develop facilities to accommodate regional demand beyond the level served by LAX." This language is similar to language on page 1-2 of the Supplemental Draft EIS/EIR (Chapter 1, Introduction) that describes the regional approach inherent in Alternative D: "whereby

growth at LAX would be planned so as to place greater pressure on other regional airports to accommodate unmet future air travel demands." Also, on page 2-1 of the Supplemental Draft EIS/EIR (Chapter 2, Purpose and Need for the Proposed Action) it is stated that "Alternative D would respond to future demand for air transportation by encouraging, but not requiring, other airports in the Los Angeles area to increase capacity to make up for the limitations of LAX." However, nowhere in the Master Plan Addendum or the EIS/EIR is it described how Alternative D would encourage other airports in the region to make up for the limitations of LAX. It is assumed that the design of Alternative D itself would encourage other airports to make appropriate capacity expansions. This is not a regional approach in that it is entirely passive, and does not actively involve other affected airports in the region in its implementation. It should be noted that the impacts on other airports from the implementation of Alternative D could be significant. For example, Alternative D proposed to reduce the number of narrow body (short haul) aircraft gates from the current 51 to 40. This proposed sharp reduction in short haul capacity at LAX could have a significant impact on nearby secondary airports to serve the short-haul market of Los Angeles County, particularly Burbank and Long Beach airports. These airports are as encroached and constrained as LAX, and have limited expansion opportunities.

B. COMMENTS ON SUPPLEMENTAL TO DRAFT LAX MASTER PLAN EIS/EIR

1. Economic Impacts of Alternative D

- **Mitigation costs:** On page 9 of the Supplemental Economic Report, Table S5, the cost of proposed environmental mitigation projects including off-airport ground access improvements should be itemized and added to the total $7.4 billion estimate for construction of Alternative D facilities and improvements.
- **Total economic impact:** On page 12, Table S10, it shows that the total economic output impact of Alternative D only exceeds that of the No Action/No Project Alternative by $32 million. This is a very meager return on the $7.4 billion estimated to construct Alternative D, not including mitigation projects. It is suggested that this section should include the non-quantifiable benefits that would accrue from implementing Alternative D, including its safety and security benefits.

2. Off-airport Ground Access Improvements

- **Cost data:** Alternative D has significantly lower estimated ground access impacts compared to previously proposed master plan alternatives. This is mainly because it is designed for a lower service level (i.e., 78 MAP) and places a markedly greater emphasis on transit access through the planning of an off-airport intermodal transfer center and five new off-airport FlyAway facilities (i.e., park-and-ride facilities for air passengers). However, significant off-airport ground access projects would still be needed to mitigate forecast traffic impacts, as listed in Technical Report 2b (Off-airport Surface Transportation). These include a new freeway interchange at I-405 and Lennox Boulevard, new freeways ramps off I-105 between Aviation Boulevard and La Cienega Boulevard, and a variety of intersection improvements and upgraded signal systems. However, there is no cost or funding detail, including estimated costs and potential funding sources, accompanying these proposed mitigation projects, including the proposed new Flyaway facilities. This detail is necessary for potential inclusion in the SCAG 2004 Draft RTP's financial plan, and future Regional Transportation Improvement Plans (RTIPs).

- **Fair share contributions:** Report 2b states that "fair-share financial contributions to regional highway improvements and/or regional transit improvements will mitigate 17 intersection." The amount of these "fair share" contributions should be specified, and the mechanism for implementing this funding arrangement should be defined.

CONCLUSIONS AND RECOMMENDATIONS

1. In general, the proposed LAX master plan project (Alternative D) is consistent with the SCAG's adopted regional forecast for LAX, although somewhat higher. To be completely consistent, Alternative D should be designed for 78 million air passengers (MAP), not 78.9 MAP.

2. Alternative D would be held to 78 MAP through passenger terminal reconfigurations and a reduction in the overall number of aircraft gates. To maintain a 78 MAP constraint at LAX utilizing available gate capacity, an additional legally enforceable implementation mechanism should be developed. The mechanism would monitor passenger throughput at established gates, and adjust the number, size and configuration of gates as needed to keep total passenger activity within the 78 MAP limitation.

3. Alternative D is more compatible than previously proposed LAX master plan alternatives with a proposed Maglev high-speed rail connection to LAX, planned for the 2010-2015 time period in SCAG's adopted regional Maglev strategy. However, the project description for the alternative does not specifically mention or address a potential Maglev connection. An appropriate reference to such a potential connection should be included in the final Master Plan Addendum and EIS/EIR.

4. The project description for Alternative D mentions a proposed regional approach that would encourage alternate airports in the region to develop their capacities to accommodate regional demand that cannot be served at LAX. However, no description is given of any active approach to encourage these airports to take appropriate actions to enhance their capacities. The secondary urban airports in the region such as Burbank and Long Beach are as constrained and encroached as LAX, and have very limited expansion opportunities.

5. SCAG's Draft 2004 Regional Transportation Plan proposes a Preferred Regional Aviation Plan that does contain a proactive regional approach to establishing increased coordination between LAX and alternate airports in the region. Elements of the decentralization strategy in this plan include:

    - Methods to increase Maglev passenger ridership to suburban airports, such as integrated pricing that would combine air fares with Maglev fares.
    - A wider range of flight offerings made available at suburban airports including Palmdale and Ontario airports. More point-to-point long haul and international service was assumed, using a new generation of highly efficient aircraft. Attractive financial packages would be offered to airlines to induce them to initiate and expand service at suburban airports. Airline "brokering" would also be implemented, to achieve coordination between airlines and between airlines and airports to achieve the greatest service efficiencies in combination with the provision of high-speed Maglev access to suburban airports.

- LAWA would play a key role in implementing the plan by integrating master planning and brokering service between LAX, Palmdale and Ontario airports. It would also enter into contractual agreements and memoranda of understanding with other airports in the region, to establish a common framework for coordinating all airport master planning and facility construction consistent with an adopted Regional Aviation Plan.
- Based on these contractual agreements and memoranda of understanding, an airport consortium would be formed that would define complementary roles and market niches between all airports in the regional system.
- An implementation plan that outlines the basic steps and timeline for implementing the Preferred Regional Aviation Plan.

It is recommended that these elements of the Preferred Regional Aviation Plan in the SCAG's Draft 2004 RTP be considered for inclusion in the Final LAX Master Plan and EIS/EIR.

6. The economic impacts of Alternative D, compared to the No Project/No Action Alternative, totals only $32 million. This is a very meager return on the estimated $7.4 billion facility cost of Alternative D, not including the cost of mitigation projects. More justification should be included in support of this expenditure, including non-quantifiable benefits.

7. No cost or funding detail is included on the estimated costs and potential funding sources for off-airport ground access mitigation projects. Such detail should be included in the final master plan and EIR/EIS documents, since it is necessary for these projects to be included in the SCAG 2004 Draft RTP's Financial Plan and future Regional Transportation Improvement Plans (RTIPS).