

Attachment A-1

**September 9, 2016 Comment Letter on the LAX Terminals
2 and 3 Modernization Project EIR Notice of Preparation
from Shute, Mihaly & Weinberger LLP**

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September 9, 2016

Via E-Mail and U.S. Mail

Angelica Espiritu
Los Angeles World Airports
One World Way, P.O. Box 92216
Los Angeles, CA 90009-2216

Re: Terminal 2 and 3 Modernization Project Notice of Preparation

Dear Ms. Espiritu:

On behalf of the City of El Segundo, thank you for the opportunity to review the Notice of Preparation for the LAX Terminal 2 and 3 Modernization Project ("Project"). We look forward to taking part in LAWA's continuing efforts to ensure that the impacts of LAX are minimized and that such burdens as cannot be avoided are shared equitably among airport neighbors.

El Segundo is particularly concerned with the sheer magnitude of this Project. The NOP indicates that the Project will approximately *double* the square footage of the terminals, and that construction would take more than six years. The NOP also indicates that there could be up to five additional gates after the Project. LAWA nonetheless predicts that there would be no long-term impacts to air quality, climate change, noise or other environmental conditions from operation of the upgraded terminals because the terminals' "linear frontage" would remain roughly the same, and thus no capacity increase would occur.

This approach disregards the impact improved access to terminals will have on passenger numbers and flight operations. The EIR's analysis of the Project and its inevitable impacts must not ignore the capacity increases or operational changes to which modifications of terminals could reasonably contribute. That analysis is particularly important in light of recent revelations that LAX may exceed the operation/passenger numbers previously assumed by LAWA in its CEQA documents (e.g., SPAS). The Terminal 2 and 3 EIR must take Project contributions to such growth into account when

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analyzing the Project's impacts, and identify feasible mitigation measures or alternatives that would reduce or avoid these impacts.

The City is also deeply concerned about the Project's proposed haul route. Despite the fact that the Project is located in the far northwest of the CTA, and that the laydown area for Project construction is in the far northwest of the entire airport, LAWA is proposing seven years of truck trips along El Segundo's northern border, which runs steps from El Segundo residents. These truck trips will produce significant air quality, greenhouse gas, traffic, and noise impacts, and exacerbate the deteriorated condition of Imperial Highway, which the City of Los Angeles has failed to repair despite years of pleas by the City and years of unfulfilled promises by Los Angeles. The proposed haul route should be changed to avoid El Segundo altogether.

In sum, the EIR's analysis and conclusions must reflect CEQA's mandate to minimize impacts on the environment. We expect that LAWA staff will bear the City's serious concerns in mind as they make appropriate modifications to the Project and conduct a thorough analysis of its impacts.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Joseph "Seph" Petta