

Attachment A-3

July 12, 2017 Comment Letter on the LAX Terminals 2
and 3 Modernization Project Final EIR from Shute, Mihaly
& Weinberger LLP

SHUTE, MIHALY
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Via E-Mail and FedEx

Angelica Espiritu
City Planner
Los Angeles World Airports
1 World Way, Room 218
Los Angeles, CA 90045
E-Mail: aespiritu@lawa.org

Re: Final Environmental Impact Report for LAX Terminals 2 and 3
Modernization Project

Dear Ms. Espiritu:

On behalf of the City of El Segundo, we submit these comments on the Final Environmental Impact Report ("FEIR") for the Terminals 2 and 3 Modernization Project (the "Project"). El Segundo appreciates LAWA's detailed responses to comments in the FEIR, and in particular the addition of the necessary information that El Segundo requested in its comments on the Draft EIR ("DEIR"). This includes the additional explanation of the asserted role of "linear frontage" in evaluating the Project's impacts, a depiction of existing gate positions at Terminals 2 and 3, and more comprehensive data pertaining to the number of narrow-body equivalent gates ("NBEG") with and without the Project.¹

Nonetheless, as explained in our detailed comments on the DEIR, El Segundo remains concerned that the FEIR fails to analyze the full scope of the Project's environmental effects, including the growth-inducing impacts of increasing the total number of passenger gate positions at Terminals 2 and 3. El Segundo also remains concerned about the Project's impacts on pavement conditions and safety on Imperial

¹ Attachment 1, provided here for inclusion in the record, contains additional information regarding flight schedules and load factors that LAWA disclosed in response to El Segundo's request under the California Public Records Act.

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Highway, a designated haul route for the Project. This issue is documented at page 16 of our April 10, 2017 comments on the DEIR.

We appreciate the opportunity to comment and look forward to continuing to monitor, and participate in, these proceedings.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Joseph "Seph" Petta

Attachments

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