

**CITY OF LOS ANGELES**  
INTERDEPARTMENTAL CORRESPONDENCE

Date: October 2, 2025

To: Hui M. Huang, PE, Division Manager  
Permit Case Management Division  
Attn: Thein Crocker, Sr. Civil Engineer

From: Maria Martin, Environmental Affairs Officer  
Environmental Management Division

  
box SIGN 4QZZVP21-4W5PXLW5

Subject: **CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW:  
SUMMARY OF RELEVANT FINDINGS AND MITIGATION MEASURES FOR  
96<sup>TH</sup> STREET FROM SEPULVEDA BOULEVARD TO ITS WESTERLY  
TERMINUS PLUS PARTIAL CURVE WESTERLY OF SEPULVEDA  
THEREOF AND RAMP WESTERLY OF SEPULVEDA THEREOF –  
VACATION E1401445**

The Environmental Management Division (EMD) reviewed the request for the street vacation of 96<sup>th</sup> Street from Sepulveda Boulevard to its westerly terminus plus partial curve westerly of Sepulveda Boulevard thereof and ramp westerly of Sepulveda Boulevard thereof (Project). The Project site is an approximate 850-foot length and 69-foot wide (varies from 64 feet to 74 feet) section of paved road with sidewalk, trees, and various utilities, including stormwater sewer and sanitary lines, street lighting, and Los Angeles Department of Water and Power (LADWP) electric cable lines.

The Project is required as part of the larger Airfield & Terminal Modernization Project (ATMP). Various roadways to and from the Los Angeles International Airport (LAX) Central Terminal Area will be relocated in order to accommodate the development of new terminal facilities (Concourse 0 and Terminal 9) and improve traffic flow in and around LAX and associated new facilities. Specifically, the Project site will be vacated and removed as part of the development for the new Concourse 0 and airfield space for a taxiway extension for Concourse 0. Additionally, the existing utilities, sidewalk, and approximately 16 trees and landscaping located along the back of the sidewalk along 96<sup>th</sup> Street west of Sepulveda Boulevard are expected to be removed as part of construction activities. Street tree removal activities would be conducted in compliance with the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513 to protect potential migratory or nesting birds or raptors and permitting requirements under the City of Los Angeles Municipal Code, Chapter VI, Sections 62.169 and 62.170, including any tree removal permits and tree replacement applications.

The EMD reviewed the following:

- Notice of Preparation and Initial Study for the LAX ATMP<sup>1</sup>, dated April 4, 2019.

---

<sup>1</sup> <https://cloud1lawwa.app.box.com/s/w1d47y9kdnv1xb3eoo3sr8w9k19fdn93>

- Draft and Final Environmental Impact Report (EIR) for the LAX ATMP<sup>2</sup> (State Clearing House No. 2019049020), dated October 2020 and August 2021 respectively, which was certified by the Board of Airport Commissioners (BOAC) on October 7, 2021.
- Final EIR Addendum for the LAX ATMP EIR<sup>3</sup> (State Clearing House No. 2019049020), dated December 2024. This addendum analyzed additional roadway system refinements.
- LAX ATMP Mitigation Monitoring and Reporting Program (MMRP<sup>4</sup>), dated August 2021, which was adopted by the BOAC on October 7, 2021.
- LAX ATMP CEQA Findings<sup>5</sup>, dated September 2021.

The CEQA documentation listed above refers to the entire street vacation. Additional roadway refinements were assessed as part of the ATMP and a Final ATMP Addendum was prepared to determine any new potential significant environmental impacts. The Final ATMP Addendum did not identify any new significant environmental impacts that were not identified from the Final ATMP EIR. All mitigation measures in the adopted MMRP are imposed on the LAX ATMP to mitigate or avoid significant effects of the LAX ATMP on the environment and to ensure compliance during Project implementation.

For the purposes of this street vacation, the EMD reviewed the applicable information of the CEQA documentation listed above as it relates to the proposed requested street vacation. The relevant findings and associated mitigation measures for this street vacation are summarized below.

### **Air Quality**

The primary sources of construction emissions for which criteria pollutant emissions were estimated include:

- Off-road construction equipment
- On-road on-site equipment and vehicles licensed to travel on public roadways
- On-road off-site vehicles, including construction worker commute vehicles
- Fugitive dust from grading and loading activities and suspended dusts from vehicles
- Fugitive VOCs from architectural coatings and hot-mix asphalt paving

---

<sup>2</sup> All documents available at <https://www.lawa.org/atmp/documents>, with the Draft EIR Document PDF available at <https://cloud1lawa.app.box.com/s/bracrr7k700eb3y7x37x02u19bsec3r5> and Final EIR Document PDF available at <https://cloud1lawa.app.box.com/s/ydc5fyx5e29mtbm1msmfvsf54u8gu9av>

<sup>3</sup> <https://cloud1lawa.app.box.com/s/3rqud9dgg63r1glygysaeia9ww46iwm8>

<sup>4</sup> <https://cloud1lawa.app.box.com/s/7e0sir5t6hd9abn2frxbr5qohdvs6r3n>

<sup>5</sup> <https://cloud1lawa.app.box.com/s/6mckfkaigt6b7u443c8929uu27njse9a>

The primary sources of future operations-related emissions for which criteria pollutant emissions were estimated include:

- Aircraft-related operations
- Ground support equipment, including sweepers and aircraft power units
- Ground access vehicles, including on-road motor vehicle activities associated with passengers, air cargo, tenant operations, and employees
- Stationary sources, including natural gas heaters for space and water heating, standby generators, and utility plant operations

Additionally, the proposed roadway system modifications are expected to slightly increase vehicles mile traveled (VMT) during operations from passenger-related motor vehicles and increase greenhouse gas emissions. This is further discussed in the Transportation/Traffic section below.

***Impacts related to the entire ATMP:***

- Regional construction and operational air emissions significance remain significant after mitigation
- Local construction and operational air emissions significance remain significant after mitigation
- Human health risk significance remains less than significant
- Construction and operational greenhouse gas emissions significance remain significant after mitigation

**Reference:** Final EIR Addendum Section 4.2.2 pages 23 to 30, and Mitigation Monitoring and Reporting Program, pages 3 to 4.

Construction and operational related air emissions (NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub>) and greenhouse gas emissions would be reduced with the mitigation measures listed below; however, not to levels that would be considered less than significant. Additionally, the proposed roadway system refinements for the ATMP as discussed in the Addendum to the Final ATMP EIR would not result in a new significant impact or substantial increase in severity of the significant impacts identified in the Final ATMP EIR.

**Mitigation Measures:** Construction- and operational-related air quality and greenhouse gas emissions impacts would be reduced with the mitigation measures listed below; however, not to levels that would be considered less than significant. To reduce those impacts, the following will be implemented:

**MM-C (ATMP)-1. Construction Mitigation Oversight.** LAWA shall require ATMP prime contractors to designate an individual responsible for ensuring implementation of all construction-related mitigation measures and LAWA policies/requirements.

**MM-AQ/GHG (ATMP)-1. Rock Crushing Operations.** LAWA shall require ATMP contractors to conduct rock-crushing operations on-site to reuse waste rock/concrete generated from construction to the maximum extent feasible.

**MM-AQ/GHG (ATMP)-2. Use of Renewable Diesel Fuel.** LAWA shall require ATMP contractors to use renewable diesel fuel for off-road equipment and on-site, on-road trucks (i.e. on-site water trucks), as feasible based on commercial renewable fuel availability.

**MM-AQ/GHG (ATMP)-3. Parking Cool Roof.** A cool roof shall be installed at Terminal 9 parking facility to reduce energy use and urban heat-island effects. This requirement will not apply if solar panels are installed at the Terminal 9 parking facility.

**MM-AQ/GHG (ATMP)-4. EV Charging Infrastructure.** EV charging infrastructure shall be installed in the Terminal 9 parking facility beyond the minimum amount required by code.

**MM-AQ/GHG (ATMP)-5. Electric Vehicle Purchasing.** LAWA shall update the Electric Vehicle Purchasing Policy to require 100 percent of LAWA's light-duty vehicle fleet to be all electric by 2031.

**MM-AQ/GHG (ATMP)-6. Solar Energy Technology.** LAWA shall implement solar energy technology, such as, but not limited to, photovoltaic solar panels on ATMP buildings and facilities, where feasible.

**MM-GHG (ATMP)-1. Demolition Waste.** LAWA shall require ATMP construction contractors to recycle or salvage a minimum of 85 percent of non-hazardous construction and demolition waste.

## **Noise**

The proposed greater LAX ATMP would generate construction-related traffic along major roadways and access routes during construction. These activities will include movement of heavy construction equipment for various construction activities, such as demolition, grading, and scraping activities. Construction of roadway improvements associated with the LAX ATMP would be located approximately greater than 1,500 feet from residences located northeast of the intersection of Sepulveda Boulevard and Westchester Parkway. Additionally, other noise-sensitive receptors, such as hotels along Century Boulevard, located approximately greater than 1,000 feet from the Project site, may be subject to construction equipment-related noise impacts from construction. The proposed roadway system refinements for the ATMP as discussed in the Addendum to the Final ATMP EIR would not result in a new significant impact or substantial increase in severity of the significant impacts identified in the Final ATMP EIR.

The LAX ATMP would include the reconfiguration of several LAX taxiways within the LAX airfield, including the proposed extension of Taxiway D for Concourse 0 along the Project site. However, these improvements would not result in changes to existing aircraft departure or approach noise.

***Impacts related to the entire ATMP:***

- Roadway traffic noise is less than significant
- Construction traffic and equipment noise and vibration are less than significant impact with mitigation

**Reference:** Final EIR Addendum Section 4.2.7 pages 40 to 54, and Mitigation Monitoring and Reporting Program, pages 3 and 6.

**Mitigation Measures:** To reduce significant construction equipment noise impacts, the following mitigation measures will be implemented:

**MM-CN (ATMP)-1 Construction Noise Control Plans.** LAWA shall require construction contractors on the landside access (i.e. roadway) improvements, the Concourse 0 improvements, and Terminal 9 improvements to develop noise control plans to address construction equipment noise-sensitive receptors where construction noise impacts may be significant and approved by LAWA prior to implementation. If calculated construction-related noise levels indicate an increase of 5 A-weighted Decibel (dBA) over baseline exterior noise level at any noise-sensitive receptor, the noise control measure shall specify measures that will attenuate noise levels to less than 5 dBA over baseline. Potential noise attenuation measures include, but not limited to, noise curtains, noise blankets, temporary sound walls, or equivalent during construction.

**MM-CN (ATMP)-2. Construction Scheduling.** The timing and/or sequence of the noisiest construction activities shall avoid noise-sensitive times of the day, as feasible (9:00 PM to 7:00 AM, Monday to Friday; 6:00 PM to 8:00 AM Saturday; anytime on Sunday or holidays).

**MM-CN (ATMP)-3. Construction Equipment.** Mobile stationary source equipment, such as generators and compressors, shall be located at the greatest distance practical from noise-sensitive land uses. "Quiet-design" air compressors and other quieter construction equipment shall be used when feasible and when such technology/equipment is commercially available.

**MM-C (ATMP)-1. Construction Mitigation Oversight.** LAWA shall require ATMP prime contractors to designate an individual responsible for ensuring implementation of all construction-related mitigation measures and LAWA policies/requirements.

**MM-AN (ATMP)-1. Sound Insulation Programs.** To mitigate significant impacts to noise-sensitive uses that are newly exposed to 65 dBA Community Noise Equivalent Level (CNEL) or greater from airport operations in future years of the proposed ATMP, LAWA will update the Noise Exposure Maps (NEM) for LAX in accordance with Title 14 CFR Part 150, prior to project completion. The NEM is the legal document required by FAA to identify noise-sensitive land uses potentially eligible for noise mitigation funding through the FAA's Airport Improvement Program. LAWA will complete the NEM Report and coordinate with FAA regulation and guidance, apply for noise mitigation funding for eligible noise-sensitive uses. LAWA will work with the appropriate jurisdiction(s) to determine/establish an appropriate program for any eligible noise mitigation. Property owners' eligibility for noise mitigation will be based upon FAA requirements and the LAX Part 150 NEM in effect at the time of operation or completion of the ATMP.

### **Transportation/Traffic**

Transportation/traffic impact analysis took into account potential conflicts related to programs, plans, ordinances, or policies addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities); substantial vehicles miles traveled (VMT); substantial additional automobile travel; and increase in hazards due to geometric design features or incompatible use. Unique characteristics of VMT associated with vehicle traffic at LAX were addressed in terms of passenger VMT, employee VMT, and potential induced VMT associated with the proposed addition of new roadways and alignments. Additionally, the VMT analysis accounted for ground transportation system would be in place when the ATMP is developed and operational in 2028 and would be significantly different than conditions in 2019 when the Final ATMP EIR was prepared.

#### ***Impacts related to the entire ATMP:***

- Conflict with program, plan, ordinance, or policy addressing the circulation system is less than significant
- Proposed increase of total passenger VMT over projected future conditions baseline (2028) is significant even with mitigation
- Increase in hazards due to geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses are less than significant

**Reference:** Final EIR Addendum Section 4.2.8 pages 54 to 59

**Mitigation Measures:** Operational traffic impacts with the new roadway improvements, particularly VMT over the projected future conditions baseline (2028), would be reduced with the mitigation measure below; however, not to levels that would be considered less than significant. Additionally, the proposed roadway system refinements for the ATMP as discussed in the Addendum to the Final ATMP EIR would not result in a new significant impact or substantial increase in severity of the significant impacts identified in the Final ATMP EIR.

**MM-T (ATMP)-1. VMT Reduction Program.** LAWA shall initiate a VMT Reduction Program that includes a variety of VMT reduction strategies that LAWA will choose from in mitigating the VMT impacts of the proposed ATMP. LAWA will monitor on an annual basis for a defined period the effectiveness of the strategies to determine if the required level of mitigation is being achieved. Topics include the following:

- Expand LAWA's Rideshare Program
- Formalize Employee Telecommuting Program
- Provide On-demand Micro-Transit Shuttle
- Market and Promote Alternative Transportation Options

Full details and potential additional strategies are provided in Section 4.8.5.2.2 of the Final ATMP EIR.

CEQA and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387) allow the City to rely on the previously certified EIR unless a Subsequent or Supplemental EIR is required. Specifically, CEQA Guidelines Sections 15162 and 15163 require preparation of a Subsequent or Supplemental EIR when an EIR has been previously certified, or a negative declaration has previously been adopted and one or more of the following circumstances exist:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
  - A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

- C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

None of the above changes or factors has arisen since the Final EIR and subsequent Addendum approvals. There are no substantial changes to the project, which is substantially the same as described in the Final EIR and Addendum. No substantial changes have been identified to the surrounding circumstances, and no new information of substantial importance has been identified and there is no evidence of new or more severe significant impacts, and no new mitigation measures are required for the project, which includes the subject street vacation.

Accordingly, there is no basis for changing any of the impact conclusions referenced in the Certified EIR's CEQA Findings. Similarly, there is no basis for changing any of the mitigation measures referenced in the certified EIR's CEQA Findings, all of which will be implemented as part of the LAX ATMP. There is no basis for finding that mitigation measures or alternatives previously rejected as infeasible are instead feasible. There is also no reason to change the determination that the overriding considerations referenced in the certified EIR's CEQA Findings, and each of them considered independently, continue to override the significant and unavoidable impacts of the LAX ATMP. The mitigation measures applicable to the street vacation are listed above in this document.

If you have any questions or require additional information, please contact Daniel Kim of my staff at (213) 485-1411 or [daniel.y.kim@lacity.org](mailto:daniel.y.kim@lacity.org).

MEM/dk

Box\EMD Project Files\E1401445 VAC - 96th St from Sepulveda Bl to its Wly Terminus plus partial curve Wly of Sepulveda Thereof and Ramp Wly of Sepulveda Thereof)\CEQA\IDC - CEQA Review E1401445\_10-02-25.doc

cc: Zubaid (Sean) Mizan, Bureau of Engineering  
Kathline King, LAWA  
Kyle Pool, LAWA