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# California Environmental Quality Act Findings

## Los Angeles International Airport (LAX)

### West Aircraft Maintenance Area Project

#### I. Project Description Summary

The LAX West Aircraft Maintenance Area Project (hereafter referred to as the proposed Project) would grade approximately 84 acres in the southwestern portion of the airfield (hereafter referred to as the Project site) and develop approximately 68 acres of the 84 acres with taxiways and aircraft parking apron areas, maintenance hangars, employee parking, service roads, and ancillary facilities (i.e., related storage, equipment and facilities). The proposed Project would be able to accommodate up to 10 Airplane Design Group (ADG) VI aircraft, such as the Airbus A380, or a mix of smaller aircraft on the site. The proposed Project would not increase passenger or gate capacity and would not increase flights and/or aircraft operations at LAX, but would consolidate, relocate, and modernize some existing maintenance facilities and activities.

Specifically, the proposed Project would include:

- (1) Aircraft apron for ADG VI aircraft as well as smaller aircraft that may require Remain Overnight (RON) and Remain All-Day (RAD) parking, or those aircraft being serviced at the current aircraft maintenance hangars;
- (2) Aircraft maintenance hangar(s), capable of accommodating a wide range of existing aircraft up to and including existing ADG VI aircraft, as well as a maintenance shop and supporting office space within the hangar;
- (3) Up to 300 employee parking spaces;
- (4) Ancillary facilities (i.e., ground service equipment [GSE], storage and maintenance areas/facilities; aircraft wash racks; RON/RAD kits providing ground power, GSE charging stations, potable water, and pre-conditioned air; necessary utilities and infrastructure; and possibly water storage tank(s) for fire protection);
- (5) A storm water detention/infiltration basin and connections to existing adjacent storm drains;
- (6) A temporary concrete batch plant and rock crusher would be installed on the site for construction of the proposed Project with removal planned after the final phase of construction (concrete batch plants are permitted on and have been operating on the site in recent years); and,
- (7) Extension of Taxiway B and Taxiway C (as Taxilane C) to provide ingress and egress to and from the Project area.
- (8) Existing contractor staging yards and associated equipment on the Project site would be phased out or relocated to existing LAX staging areas, such as those located to the south of Westchester Parkway and west of Lincoln Boulevard. Stockpiled materials (consisting of soil and construction rubble) currently existing within and immediately adjacent to the Project site would be re-used on-site as backfill material and/or exported for off-site reuse and/or disposal.

## **II. Project Objectives**

The objectives of the proposed Project include the following:

- Consolidate, relocate, and modernize certain existing aircraft maintenance facilities at LAX consistent with the LAX Master Plan.
- Provide for more efficient and effective maintenance of existing aircraft at the airport, including ADG VI aircraft (i.e., Airbus A380 and Boeing 747-8).
- Provide aircraft maintenance hangars and aircraft parking areas that are all sized to accommodate ADG VI aircraft and other aircraft in one location.
- Provide an area for RON/RAD aircraft parking that can also support routine servicing and maintenance of aircraft.
- Support consistency with the LAX Master Plan by providing an aircraft maintenance area in the southwest portion of the airport.

## **III. Procedural History**

Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project (proposed Project) pursuant to the California Environmental Quality Act (CEQA). An Initial Study (IS) and Notice of Preparation (NOP) for the Draft EIR was circulated for public review from September 14, 2012 to October 15, 2012. In response to requests from the public, LAWA extended the public review period for the IS/NOP by 15 days until October 30, 2012. During the public review period, LAWA held a public Scoping Meeting on October 4, 2012, at the Flight Path Learning Center and Museum at LAX. On October 17, 2013, LAWA published the Draft EIR which was circulated for public review for 45 days, with the review period closing on December 2, 2013. A public workshop was held on November 5, 2013, during the public review period. The City of Los Angeles published the Final EIR for the proposed Project in February 2014. The Final EIR incorporates and responds to comments received on the Draft EIR and includes corrections and additions to the Draft EIR. Project Design Features (PDFs), Project-specific Mitigation Measures, and applicable LAX Master Plan Commitments and Mitigation Measures have been included in a Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project. LAWA, the Board of Airport Commissioners (BOAC), and other decision-makers will use the Final EIR to inform their decisions on the proposed Project, as CEQA requires.

The findings herein have been prepared to reflect approval of the proposed Project as amended in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR.

## **IV. Environmental Impacts and Findings**

Pursuant to Public Resources Code §21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
- Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

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BOAC has made one or more of these specific written findings regarding each significant impact associated with the proposed Project. Those findings are presented below, along with a presentation of facts in support of the findings. Concurrent with the adoption of these findings, BOAC adopts the Project Design Features, Commitments and Mitigation Monitoring and Reporting Program (CEQA Guidelines §15097(a)).

### A. Findings on Significant and Unavoidable Impacts

#### Air Quality

Description of Effects: As analyzed in Section 4.1, *Air Quality* of the Draft EIR, the proposed Project would generate air pollutant emissions during construction of the proposed Project.

#### *Construction-Related Air Quality Impacts*

As shown in Table 4.1-10, within Section 4.1, *Air Quality*, of the Draft EIR, construction of the proposed Project is predicted to result in maximum daily emissions that exceed the SCAQMD regional construction thresholds for NO<sub>x</sub> during six quarters and is not predicted to exceed the thresholds during the other seven quarters of construction activity. The NO<sub>x</sub> exceedance is limited to the initial and middle stages of construction, when grading and hangar construction would occur.

LAWA is committed to mitigating temporary construction-related emissions to the extent feasible and has established some of the most aggressive construction emissions reduction measures in Southern California, particularly with regard to requiring construction equipment to be equipped with emissions control devices. The air quality control measures set forth by LAWA for development projects at LAX take into account LAX Master Plan Commitments and Mitigation Measures, Community Benefits Agreement and Stipulated Settlement measures, and measures identified in EIRs for other projects at LAX. In addition, the Los Angeles Green Building Code (LAGBD) Tier 1 standards, which are applicable to all projects with a Los Angeles Department of Building and Safety (LADBS) permit-valuation over \$200,000, require the proposed Project to implement a number of measures that would reduce criteria pollutant and greenhouse gas (GHG) emissions. As discussed in Section 4.1, *Air Quality*, of the Draft EIR, LAX Master Plan Mitigation Measures that pertain to air quality and that are applicable to the proposed Project include LAX-AQ-1- *General Air Quality Control Measures*, LAX-AQ-2- *LAX Master Plan Mitigation Plan for Air Quality; Construction-Related Measures*, and LAX-AQ-4-*Operation-Related Control Measures*. The specific means for implementing the mitigation measures described in Section 4.1, *Air Quality*, of the Draft EIR were approved with the LAX Master Plan EIR and would also be applied to the proposed Project. These mitigation measures establish a commitment and process for incorporating all technically feasible air quality mitigation measures into all LAX projects.

Based on discussions with the South Coast Air Quality Management District (SCAQMD), subsequent to the circulation of the Draft EIR, LAWA agreed to add a Project-specific Mitigation Measure that would be incorporated into bid documents for this proposed Project specifying that contractors should use equipment on the proposed Project that meets the most stringent emission requirements. Because it is difficult for LAWA to determine whether equipment is available that meets the most stringent emission requirements, for purposes of this analysis LAWA has kept the equipment mix specified in the Draft EIR, but will require contractors to use equipment that meets stricter standards if available.

The following Project-specific Mitigation Measure, *MM-AQ (WAMA)-1*, will supersede the construction-related air quality control measure “2o” under LAX-AQ-2, LAX Master Plan - Mitigation Plan for Air Quality; Construction-Related Measures:

***MM-AQ (WAMA)-1.*** On-road trucks used on LAX construction projects with a gross vehicle weight rating of at least 19,500 pounds shall, at a minimum, comply with USEPA 2010 on-road emissions standards for PM<sub>10</sub> and NO<sub>x</sub>. Contractor requirements to utilize such on-road haul trucks or the next cleanest vehicle available will be subject to the provisions of LAWA Air Quality

Control Measure “2x” (part of LAX Master Plan Commitment LAX-AQ-2, LAX Master Plan - Mitigation Plan for Air Quality; Construction-Related Measures). All off-road diesel-powered construction equipment greater than 50 horsepower shall meet, at a minimum, USEPA Tier 3 off-road emission standards. In addition, all off-road diesel-powered construction equipment greater than 50 hp with engines meeting USEPA Tier 3 off-road emission standards shall be retrofitted with a CARB-verified Level 3 Diesel Emissions Control Strategies (DECS). Any emissions control device used by the Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. In the event the Contractor is using off-road diesel-powered construction equipment with engines meeting USEPA Tier 4 off-road emission standards and is already supplied with a factory-equipped diesel particulate filter, no retrofitting with DECS is required. Contractor requirements to utilize Tier 3 equipment or next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure “2x”. LAWA will encourage construction contractors to apply for SCAQMD “SOON” funds to accelerate clean-up of off-road diesel engine emissions.

Even with incorporation of feasible construction-related control measures, LAX Master Plan Mitigation Measures, and addition of a Project-specific Mitigation Measure *MM-AQ (WAMA)-1* as described above and in Section 4.1, *Air Quality*, of the Draft EIR, the maximum peak daily construction-related regional mass emissions resulting from the proposed Project would be significant for NO<sub>x</sub> during the initial and middle stages of proposed Project construction, as shown by the emissions inventory. LAWA has not identified any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance. As such, the NO<sub>x</sub> impact would be significant and unavoidable.

### *Cumulative Construction-Related Air Quality Impacts*

Twelve LAX-related construction projects are expected to occur during the four-year duration of the proposed Project construction. Projects that were considered in the cumulative air quality analysis include the Runway Safety Area Improvements-South Airfield; Runway Safety Area Improvements-North Airfield; LAX Bradley West Project – Remaining Work; Terminal 3 Connector (Part of Bradley West Project); North Terminals Major Renovation (T-1); South Terminals Major Renovation (T-5 through T-8); Midfield Satellite Concourse: Phase 1 - North Concourse Project; Central Utility Plant Replacement Project – Remaining Work; Miscellaneous Projects/Improvements; LAX Northside Area Development; LAX Master Plan Alt. D/SPAS Alt. 3; and the Metro Crenshaw/LAX Transit Corridor and Station.

Construction of the proposed Project would exceed the Project-specific significance threshold for NO<sub>x</sub>. As a result, the proposed Project would have a cumulatively considerable contribution for construction emissions and would result in a cumulatively significant construction impact.

Findings: Even with incorporation of feasible construction-related control measures, and mitigation measures, the maximum peak daily construction-related regional mass emissions resulting from the proposed Project would be significant for NO<sub>x</sub> during the initial and middle stages of proposed Project construction. There are not any additional feasible mitigation measures that could be adopted at this time to further reduce this impact to below significance.

Despite incorporation of these measures, the BOAC hereby finds construction-related air quality impacts related to NO<sub>x</sub> would remain significant and unavoidable and that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the LAX Master Plan Mitigation Measure and Project-Specific Mitigation Measure identified above, which will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project, no other air quality mitigation measures are feasible that would mitigate Project-specific and cumulative impacts to air quality during the construction period.

**B. Findings on Less-than-Significant Impacts and Impacts that Will be Reduced to Below the Level of Significance with Mitigation**

**a. Air Quality**

Description of Effects: As analyzed in Section 4.1, *Air Quality*, of the Draft EIR, the proposed Project would generate air pollutant emissions during construction and operation of the proposed Project.

**Criteria Pollutant Emissions**

*Construction-Related Air Quality Impacts*

As shown in Table 4.1-10, within Section 4.1, *Air Quality*, of the Draft EIR, construction of the proposed Project is not predicted to exceed the SCAQMD regional construction thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during any quarter with construction activity.

*Operation-Related Air Quality Impacts*

As discussed in Section 4.1, *Air Quality*, of the Draft EIR, operation of the proposed Project is not expected to generate new emissions associated with aircraft maintenance because the proposed Project simply redirects and consolidates existing aircraft maintenance operations. However, the redirection and consolidation of maintenance operations to the Project site would result in longer distances between gates and maintenance with some additional taxi/towing emissions. The number of run-ups from aircraft engine testing is not expected to increase compared to the current condition, nor is additional on-road vehicle traffic expected as a result of the proposed Project. As presented within Section 4.1, *Air Quality*, of the Draft EIR, regional emissions resulting from operation of the proposed Project are substantially below applicable thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. As a result, impacts related to regional emissions from operation of the proposed Project would be less than significant.

LAWA is committed to mitigating temporary construction-related emissions to the extent feasible and has established some of the most aggressive construction emissions reduction measures in Southern California, particularly with regard to requiring construction equipment to be equipped with emissions control devices. The air quality control measures set forth by LAWA for development projects at LAX take into account LAX Master Plan Commitments and Mitigation Measures, Community Benefits Agreement and Stipulated Settlement measures, and measures identified in EIRs for other projects at LAX. In addition, the LAGBC Tier 1 standards, which are applicable to all projects with a LADBS permit-valuation over \$200,000, require the proposed Project to implement a number of measures that would reduce criteria pollutant and GHG emissions. As discussed in Section 4.1, *Air Quality*, of the Draft EIR, LAX Master Plan Mitigation Measures that pertain to air quality and that are applicable to the proposed Project include *LAX-AQ-1- General Air Quality Control Measures*, *LAX-AQ-2- LAX Master Plan Mitigation Plan for Air Quality; Construction-Related Measures*, and *LAX-AQ-4-Operation-Related Control Measures*. The specific means for implementing the mitigation measures described in Section 4.1, *Air Quality*, of the Draft EIR were approved with the LAX Master Plan EIR and would also be applied to the proposed Project. These mitigation measures establish a commitment and process for incorporating all technically feasible air quality mitigation measures into all LAWA projects at LAX.

Findings: Based on substantial evidence in the administrative record, including Section 4.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that the proposed Project would not have significant operation-related air quality impact. Construction of the proposed Project is not predicted to exceed the SCAQMD regional construction thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>.

Applicable LAX Master Plan Commitments and Mitigation Measures identified in Section 4.1, *Air Quality*, of the Draft EIR, will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that

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VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> construction-related air quality impacts and operation-related air quality impacts would be less than significant. No further mitigation measures are required.

### **Odors**

Description of Effects: As analyzed in Section 4.1, *Air Quality*, of the Draft EIR, the proposed Project may emit odors during construction and operation of the proposed Project.

#### *Construction-Related Impacts*

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents and from diesel emissions. SCAQMD limits the amount of volatile organic compounds (VOCs) from architectural coatings and solvents. As discussed previously, the proposed Project would comply with diesel particulate matter (DPM) reduction strategies. Due to mandatory compliance with SCAQMD Rules and compliance with the DPM reduction strategies, no construction activities or materials are proposed which would create objectionable odors affecting a substantial number of people. In addition, the nearest sensitive receptors are located beyond the LAX property line and would be further buffered by the dissipation of odors with distance and prevailing winds. Therefore, no impact would occur and no mitigation measures would be required.

#### *Operation-Related Impacts*

According to the SCAQMD, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors. As the proposed Project activities would not be a source of odors, potential odor impacts would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that the potential odor impacts would be less than significant. No further mitigation measures are required.

### **Human Health Risk**

Description of Effects: As analyzed in Section 4.1, *Air Quality* of the Draft EIR, human health risk from the inhalation exposure to toxic air contaminants (TACs) released during construction and operation of the proposed Project could occur. Environmental consequences considered are cancer risks and non-cancer chronic and acute health hazards. Possible human health effects are discussed as they relate to on-site Project workers, non-Project workers (off and on airport), off-airport resident adults, off-airport resident children, and off-airport school children. LAX Master Plan Mitigation Measures applicable to the proposed Project include: *LAX-AQ-1- General Air Quality Control Measures*, *LAX-AQ-2- LAX Master Plan Mitigation Plan for Air Quality; Construction-Related Measures*, and *LAX-AQ-4-Operation-Related Control Measures*. These measures were incorporated into the health risk analysis for the proposed Project.

#### *Construction-Related Human Health Risk Impacts*

As discussed in Section 4.1, *Air Quality*, of the Draft EIR, formaldehyde and manganese are the only TAC of concern in construction emissions from the Project that might be present at concentrations approaching the thresholds for acute health hazards. As discussed in Section 4.1, *Air Quality*, of the Draft EIR, hazards quotients due to acute exposure to formaldehyde and manganese are below 1 for all off-site evaluated grid nodes within the study area under the proposed Project; hence, Project impacts related to acute health hazards would be less than significant.

As discussed in Section 4.1, *Air Quality*, of the Draft EIR, one million, Project-related cancer risks for adults and for young children would be below the threshold of significance of 10 in one million

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for Project construction. Therefore, the proposed Project impacts related to cancer risks would be less than significant. The analysis provided in Section 4.1, *Air Quality*, of the Draft EIR, also indicates that Project-related chronic non-cancer hazards would be less than the hazard index threshold of 1; hence, the proposed Project's impact related to chronic non-cancer hazards would be less than significant. Air concentrations from airport emissions with implementation of the proposed Project would also not exceed those considered "acceptable" by California Occupational Safety and Health Administration (CalOSHA) standards. Therefore, the proposed Project impacts related to on-site worker concentrations would be less than significant.

### *Operation-Related Human Health Risk Impacts*

The proposed Project would consolidate, relocate, and modernize existing aircraft maintenance activities occurring at LAX. Operation of the proposed Project would not result in additional or increased operational or maintenance activities at LAX. The future operation of the proposed Project would not result in long-term operational changes to traffic activity and traffic flows within the airport study area as, in the long-term, the proposed Project would not increase the number of employees or airline passengers traveling to/through LAX. A slight increase in taxiing or towing emissions, compared to baseline conditions, would occur due to slightly longer distances between gates and the Project site. Furthermore, according to meteorological data provided by the SCAQMD, the average daily (daytime and nighttime) prevailing winds at LAX are generally directed along a southwest-to-northeast axis. As such, the prevailing winds, relative to the Project site, would generally disperse pollutants over LAX property prior to reaching distant off-site sensitive receptors, or the Pacific Ocean. This dispersion effect would reduce the potential for exposures to TACs at sensitive receptors. However, the SCAQMD's Tier 2 screening method for assessing potential health risks, which provides conservative results for health risk, was applied to the incremental operational emissions. Based on the analysis provided in Section 4.1, *Air Quality*, of the Draft EIR, the proposed Project would result in a less than significant operational impact relative to cancer risks and chronic non-cancer hazards, acute health hazards, and on-site worker concentrations.

### *Cumulative Human Health Risk Impacts*

As noted in Section 4.1, *Air Quality* and Section 2.4 of Appendix B.3, of the Draft EIR, cumulative human health risks are expected to be less than significant.

**Findings:** Based on substantial evidence in the administrative record, including Section 4.1, *Air Quality*, of the Draft EIR, the BOAC hereby finds and determines that cancer, non-cancer chronic, acute health hazards, and on-site worker concentration compared to OSHA limits would be less than significant for all receptor types. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures in Section 4.1, *Air Quality*, of the Draft EIR, is not required to address the less than significant human health risk impacts. Applicable LAX Master Plan Mitigation Measures will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that human health risk impacts would be less than significant. No further mitigation measures are required.

### **b. Greenhouse Gas Emissions**

**Description of Effects:** The GHG analysis provided in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, examines potential GHG emissions associated with the proposed Project, as may contribute to global climate change (GCC) impacts. Total GHG emissions from the proposed Project were quantified to determine whether the proposed Project would be consistent with the Global Warming Solutions Act of 2006, also known as Assembly Bill (AB) 32 (i.e., reduction of statewide GHG emissions to 1990 levels by 2020). LAX Master Plan Mitigation Measures applicable to the proposed Project include *LAX-AQ-1- General Air Quality Control Measures*, *LAX-AQ-2- LAX Master Plan Mitigation Plan for Air Quality*, *Construction-Related Measures*, and *LAX-AQ-4-Operation-Related Control Measures*.

### **Construction Related GHG Impacts**

The proposed Project-related construction sources for which GHG emissions were calculated include: (1) Off-road construction equipment; (2) On-road trucks; and (3) Construction worker commute vehicles. The analysis provided in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, addresses both direct and indirect GHG emissions. Direct sources of GHG emissions from the proposed Project include the consumption of natural gas for airport operations, including heating/cooling; worker, and vendor car/truck trips; construction and operation equipment; and landscape activities. Indirect sources of GHG emissions related to the proposed Project include the consumption of purchased electricity and water usage.

Construction of the proposed Project is estimated to emit a total of 12,971 metric tons of CO<sub>2</sub>e (MTCO<sub>2</sub>e) during construction. When amortized over 30 years, construction results in approximately 432 MTCO<sub>2</sub>e per year. As discussed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, the significance of construction-related impacts is not determined separately for GHG emissions. Rather, the significance of construction-related and operation-related GHG emissions for the proposed Project are evaluated together, as discussed below.

### **Operation-Related GHG Impacts**

Operation of the proposed Project is not expected to generate new emissions associated with aircraft maintenance because the proposed Project simply consolidates, relocates and modernizes existing aircraft maintenance operations. However, the redirection and consolidation of maintenance operations to the proposed Project would result in longer distances between gates and maintenance with some additional taxi/towing emissions. As analyzed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, future operational GHG emissions are 98 metric tons CO<sub>2</sub>e per year, which when combined with the amortized construction emissions indicated above, would contribute to a total of 530 MTCO<sub>2</sub>e per year. Emissions from amortized construction and operation of the proposed Project would be below the SCAQMD draft threshold of 10,000 MTCO<sub>2</sub>e per year. Therefore, the proposed Project would result in a less than significant impact with regard to GHG emissions.

### **Consistency with Greenhouse Gas Reduction Plans**

The proposed Project would comply with the LAGBC Tier 1 requirements. LAWA has based its new sustainable construction standards on the mandatory and voluntary tiers defined in the LAGBC. All building projects with an LADBS permit-valuation over \$200,000 shall achieve LAGBC Tier 1 conformance, to be certified by LADBS during final plan check (on the issued building permit) and validated by the LADBS inspector during final inspection (on the Certificate of Occupancy). The requirements of the adopted LAGBC apply to new building construction, building renovations, and building additions within the City of Los Angeles. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. The proposed Project would comply with the mandatory requirements for nonresidential buildings including the mandatory requirements for Tier 1 conformance. As a result, the proposed Project would be consistent with plans to reduce GHG emissions and impacts would be less than significant.

### **Impacts from Climate Change**

As discussed in Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, temperature increases anticipated to occur in conjunction with climate change would lead to environmental impacts in a wide variety of areas, including: sea level rise, reduced snow pack resulting in changes to existing water resources, increased risk of wildfires, and public health hazards associated with higher peak temperatures, heat waves, and decreased air quality. Of these potential climate change-related impacts, sea level rise is most relevant to the proposed Project. The Project site would have a finish surface elevation of approximately 110 feet above sea level and is located within

approximately one mile of the coast. It is not anticipated that the Project site would be subject to a 100+ foot (30+ meter) increase in sea level rise in the foreseeable future. Additionally, it is not feasible to design and construct the project at a higher elevation (i.e., adaptive management for long-term GCC impacts such as sea level rise), due to the need for the proposed Project to maintain elevations comparable to those of the existing taxiway system at LAX. As such impacts would be less than significant.

**Findings:** Based on substantial evidence in the administrative record, including Section 4.2, *Greenhouse Gas Emissions*, of the Draft EIR, the BOAC hereby finds and determines that the proposed Project with incorporation of LAX Master Plan Mitigation Measures *LAX-AQ-1- General Air Quality Control Measures*, *LAX-AQ-2- LAX Master Plan Mitigation Plan for Air Quality; Construction-Related Measures*, and *LAX-AQ-4-Operation-Related Control Measures* would have a less than significant impact to GHG. Therefore, mitigation beyond that already provided under the LAX Master Plan Mitigation Measures is not required to address the less than significant GHG impacts. Applicable LAX Master Plan Mitigation Measures will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that GHG impacts would be less than significant. No further mitigation measures are required.

### **c. Hazards and Hazardous Materials**

**Description of Effects:** Section 4.3, *Hazards and Hazardous Materials*, of the Draft EIR, analyzes recognized environmental conditions and assesses the potential for significant impacts associated with hazards or hazardous materials during construction and/or operation of the proposed Project. Impacts were assessed in relation to: the type of hazardous materials that would be transported, used, generated, or stored as a result of the proposed Project; the potential for accidents involving hazardous materials releases; worker exposure to hazards or hazardous materials; and, the ability of known disposal facilities to accommodate the volume of hazardous materials generated during the proposed Project's construction and operation. LAX Master Plan Commitments applicable to the proposed Project include *HM-1, Ensure Continued Implementation of Existing Remediation Efforts* and *HM-2, Handling of Contaminated Materials Encountered During Construction*. In addition, one Project-specific Mitigation Measure to address impacts associated with Hazards and Hazardous Materials was identified: Mitigation Measure *MM-HAZ (WAMA)-1* requires additional research to determine the exact location of abandoned/plugged oil wells and if these wells were abandoned in conformance with current regulations. Implementation of this mitigation measure would require conformance with the Division of Oil, Gas, and Geothermal Resources (DOGGR) and City of Los Angeles Fire Department regulations prior to construction.

The release of hazardous materials during construction is also subject to Section 5.5 of the LAX Master Plan Alternative D Mitigation Monitoring and Reporting Program *Procedure for the Management of Contaminated Materials Encountered During Construction* (the "Procedure") prepared for the LAX Master Plan Environmental Impact Statement (EIS)/EIR. The Procedure was approved in 2005 to facilitate implementation of LAX Master Plan Commitment *HM-2, Handling of Contaminated Materials Encountered During Construction*. The Procedure requires implementation of best management practices (BMPs) as part of the Storm Water Pollutant Prevention Plan (SWPPP) during construction to contain any hazardous materials spills. The Procedure also requires the presence of sufficient trained hazardous waste operations and emergency response (HAZWOPER) trained personnel to initiate spill and release response, and contact proper regulatory agencies.

### **Construction-Related Hazards and Hazardous Material Impacts**

#### *Stockpile Areas and Potentially Contaminated Soils*

The proposed Project would require the removal of an estimated 295,000 cubic yards of stockpiled materials. The stockpiled materials do not contain concentrations of contaminants that

qualify them as Class I hazardous materials. If previously undiscovered hazardous materials are encountered during stockpile removal or other portions of construction, they would be conducted in accordance with applicable federal, state, and local regulations, including LAWA's Procedure, which was prepared in accordance with LAX Master Plan Commitment *HM-2*, and BMPs. Any hazardous materials found at the Project site that would be transported off-site would be done by licensed operators in accordance with all applicable federal, state, and local regulations. As a result, the removal of stockpiled soils or previously undiscovered hazardous materials would result in a less than significant impact.

### *Oil Wells*

Construction activities could encounter previously abandoned oil wells, resulting in a potentially significant release of hazardous materials. The Project-specific Mitigation Measure *MM-HAZ (WAMA)-1* would ensure proper confirmation and proper abandonment of any oil wells discovered. With implementation of Mitigation Measure *MM-HAZ (WAMA)-1*, impacts with regard to encountering abandoned oils wells would be reduced to a less than significant level.

### *Methane*

The Project site is located in a City of Los Angeles-designated methane zone, and therefore a methane site investigation would be performed prior to any grading activities to determine whether elevated concentrations of methane are present. As stated below, a significant hazard associated with construction activities is generally not expected to occur because elevated concentrations of methane gas are not expected to occur. In addition, prior to construction, the construction Contractor would be required by LAWA and the City of Los Angeles Department of Building and Safety to prepare a Health and Safety Plan. The Health and Safety Plan would comply with OSHA Safety and Health Standards and CalOSHA requirements and would address, as appropriate, safety requirements that would serve to avoid significant impacts in the event that elevated levels of these soil gases are encountered during grading and construction. Therefore, construction impacts related to methane would be less than significant and no mitigation is required.

### *Exposure of Workers to Hazardous Materials*

Contaminated soils could be unexpectedly encountered during grading and excavation. However, compliance with the Procedure currently in place by LAWA sets forth appropriate procedures and requirements for the identification and handling of excavated contaminated materials. In the event that Project-related excavation unexpectedly encounters VOC-contaminated soil, the continuation of such excavation would be carried out in accordance with SCAQMD Rule 1166. In addition, based on the depth of groundwater at the Project site the construction of the proposed Project would not encounter contaminated groundwater. Elevated concentrations of methane are not anticipated to result in a significant impact during construction because the methane hazard (combustion) concentrations above 50,000 parts per million would quickly disperse to lower concentrations once they reach the surface. In addition, the exposure of workers to methane is regulated by OSHA and CalOSHA, as well as through the Procedure. Therefore, construction of the proposed Project would result in a less than significant impact with regard to exposing workers to hazardous materials associated with contaminated soil, contaminated groundwater, and methane gas.

### *Contamination of Soil & Groundwater/Prevention of Cleanup*

Only one ongoing remediation effort is occurring in the vicinity of the Project site; the vacuum-enhanced free product system (VEFPR) system for a groundwater contamination plume originating at the former Continental Airlines Maintenance Facility. The VEFPR includes three on-site groundwater monitoring wells (i.e., CMW-31, CMW-32, CMW-33). As part of the construction of the proposed Project, these monitoring wells would be protected in place, enclosed in concrete vaults with load bearing grates at the surface to provide for continued

access. LAWA would coordinate with the operator of the remediation system. Impacts, if any, to the remediation system would be less than significant.

As it relates to the discovery of unknown contamination during construction, the Procedure (that facilitates implementation of LAX Master Plan Commitment *HM-2, Handling of Contaminated Materials Encountered During Construction*) provides detailed guidance for especially for projects involving excavation and grading of soils. The Procedure requires the preparation of detailed plans for handling previously unknown contaminated soil encountered during construction, as well as spills of hazardous materials or substances that may occur during construction. It also requires preparation of a detailed Health and Safety Plan, and provisions for testing and segregation of contaminated soils for proper disposal. Therefore, the proposed Project would result in less than significant impacts with respect to unknown contamination.

### *Impacts Related to Landfill Capacity*

The proposed Project would require the removal of an estimated 295,000 cubic yards of stockpiled soils. The stockpiled soils do not contain concentrations of contaminants that qualify them as Class I hazardous materials. As a result, the stockpiled soils could be disposed of at a Class III Municipal Solid Waste (MSW) landfill. As discussed in Section 4.3, *Hazards and Hazardous Materials*, of the Draft EIR, there is ample capacity of MSW landfills in Los Angeles County to accommodate the 295,000 cubic yards of soil required to be hauled from the Project site. Should hazardous materials be unexpectedly encountered during construction activities, they would be disposed of in accordance with the Procedure, which would identify disposal options for previously unidentified hazardous materials. Therefore, construction of the proposed Project would not generate hazardous materials which would exceed the available disposal capacity and a less than significant impact would result.

### **Operation-Related Hazards and Hazardous Material Impacts**

#### *Handling of Hazardous Materials*

As the maintenance activities that would occur on the Project site already occur on the airport in the same general area, the consolidation of these activities under the proposed Project would not increase the chances of a spill or release of substances that could result in contamination of soil or groundwater. Although fuel dispensing of aircraft by tanker truck could occur on the apron area of the Project site, no fuel storage would occur on the Project site. LAWA has procedures already in place to reduce hazardous materials-related incidents and spills. These regulations and provisions are in place so potential spills and releases would not create a hazard to the public or the environment, and would not result in contamination of soil or groundwater. Therefore, impacts with respect to the handling of hazardous materials would not create a hazard to the public or the environment and impacts would be less than significant.

#### *Methane*

The Project site is located in a City-designated methane zone. In accordance with City requirements, a methane site investigation would be performed at the Project site prior to any grading activities to determine whether elevated concentrations of methane are present and, if so, to identify the appropriate level of methane safety measures to incorporate into the final site design and construction specifications. Based on adherence to existing City regulations and requirements, potential methane impacts related to implementation of the proposed Project would be less than significant.

#### *Exposure of Workers to Hazardous Materials*

The proposed Project would accommodate the same types of routine maintenance activities that are currently occurring at various places throughout LAX airport. As with current operations, maintenance workers would continue to comply with all applicable regulations. For instance, exposure of maintenance workers to contaminated materials would be minimized by

implementing the measures required by federal, state, and local laws and regulations. Therefore, the proposed Project would result in less than significant impacts with respect to maintenance worker exposure to hazardous materials.

The Project site is located in the City-designated methane zone. Interior methane levels would be regulated in accordance with Los Angeles Methane Seepage Regulations, which could require design features such as methane barriers, methane detection systems, and venting systems should hazardous levels of methane be detected during pre-construction investigations. Adherence with the applicable regulations would ensure that interior methane levels do not reach limits that would pose a threat to maintenance workers or rise to explosive levels, and a less than significant impact would result.

*Contamination of Soil & Groundwater/Prevention of Cleanup*

Maintenance activities would occur within the boundaries of the Project site, where no remediation efforts are currently taking place. Construction of the proposed Project would include the protection-in-place of the three existing on-site monitoring wells. Proposed Project operations would not result in any additional impacts to these monitoring wells, or other remediation efforts occurring in the Project vicinity. Therefore operational impacts would be less than significant.

*Impacts Related to Landfill Capacity*

The proposed Project would accommodate the same types of the routine maintenance activities that are currently occurring elsewhere at the airport; hence, the types of hazardous wastes generated under the proposed Project are expected to be similar to those now generated. Because proposed Project operations would relocate existing maintenance operations, there would not be an increase in the amount of hazardous materials generated at LAX as a whole. As existing disposal capacity adequately meets the needs of routine maintenance activities currently occurring at LAX, the proposed Project would not result in an exceedance of hazardous waste disposal capacity and a less than significant impact would result.

**Cumulative Impacts**

The exposure of construction workers to contaminated substances or hazardous building materials, air transport of hazardous substances, and interference with ongoing soil and groundwater remediation generation are not subject to cumulative effects, as this impact is site-specific and limited to particular construction workers that are employed at a construction site where contaminated materials may be uncovered.

Development of the related projects in the area, in conjunction with the proposed Project could result in a potential increase in impacts relative to the ground transport of hazardous materials and wastes and increased demand for hazardous waste treatment, recycling, and disposal. However, proper packaging and handling of hazardous materials and wastes, coupled with employee training and emergency response, would reduce cumulative impacts of increased ground transport of hazardous materials/wastes to a level that is less than significant.

With respect to the cumulative demand for treatment, recycling, and disposal of hazardous waste from related projects, sufficient hazardous waste disposal capacity is expected to be available to accommodate related projects. Therefore, the impact of cumulative increases in hazardous waste generation would be less than significant.

Groundwater remediation is occurring on the former Continental Airlines ACMX. However, the extent of the jet fuel plume is static and does not encroach on the Project site. A halogenated volatile organic compound (HVOC) plume is currently located south and east of the Project site, with HVOC concentrations increasing at groundwater monitoring wells upgradient (east) of the VEFPR system. Any future remediation of the HVOC plume would occur in accordance with the applicable regulatory requirements. Further, the presence of the HVOC plume in combination with the proposed Project would not impede existing groundwater remediation efforts currently

underway with the VEFPR system. Therefore, there would be no cumulative impacts related to ongoing remediation efforts.

As the proposed Project would consolidate certain existing maintenance activities within LAX, no notable increase in the use and storage of hazardous materials is anticipated to result from the proposed Project. Compliance with existing regulations and operating procedures in accordance with LAWA's Procedure and BMPs for hazardous materials would continue to reduce the potential for releases to occur and would minimize the impact of a release were one to occur. Therefore, this impact would be less than significant. Related projects would be subject to the same regulations and operating procedures. Therefore, cumulative impacts would also be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.3, *Hazards and Hazardous Materials*, of the Draft EIR, the BOAC hereby finds and determines that construction and operation of the proposed Project with incorporation of LAX Master Plan Commitments *HM-1, Ensure Continued Implementation of Existing Remediation Efforts* and *HM-2, Handling of Contaminated Materials Encountered During Construction*, and Project-specific Mitigation Measure *MM-HAZ (WAMA)-1* and existing regulatory programs and requirements would have a less than significant impact to hazards and hazardous materials. These applicable LAX Master Plan Commitments and Project-specific Mitigation Measure will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that impacts to hazards and hazardous materials would be less than significant. No further mitigation measures are required.

#### **d. Hydrology and Water Quality**

Description of Effects: Section 4.4, *Hydrology and Water Quality*, of the Draft EIR analyzed the potential for the proposed Project to result in significant hydrology (drainage, groundwater) and water quality impacts. The LAX Master Plan Commitment and Mitigation Measures applicable to the proposed Project include *HWQ-1, Conceptual Drainage Plan* and *MM-HWQ-1, Update Regional Drainage Facilities*.

#### **Construction-Related Impacts**

##### *Drainage and Water Quality*

Construction of the proposed Project could include sources of pollution that could potentially affect the quality of the receiving water (e.g., Santa Monica Bay) during the construction period. Potential sources of pollutants would include sediment, spills or leaks of fuels or hazardous materials, and contaminants associated with construction materials.

Because proposed Project construction activities would affect an area of greater than one acre, development and implementation of a Project-specific construction SWPPP would be required in order to meet the requirements of the statewide General Permit for Construction. BMPs within the construction SWPPP are anticipated to include, but not be limited to, the following:

- Sediment control methods such as sand/gravel bags, silt fences, and dust control;
- Construction training programs;
- Material transfer practices (e.g., covering of soil loads, watering of exposed soil, etc.);
- Waste management practices such as providing designated storage areas and containers for specific wastes for regular collection;
- Roadway cleaning/tracking control practices;
- Vehicle and equipment cleaning and maintenance practices; and
- Fueling practices.
- Inlet protection

With implementation of the required Project-specific SWPPP, the proposed Project construction-related hydrology and water quality impacts would be less than significant.

### **Operation-Related Impacts**

#### *Drainage*

The proposed Project would result in only minor changes to the existing drainage pattern and would continue to ultimately flow to the existing reinforced concrete box (RCB) along Pershing Drive. In addition, the proposed Project would reduce existing peak flows in three of the four storm drains that serve the Project site. It is important to note that the design features will not fully relieve the existing storm drain capacity issues upstream of the Project site. However, with the implementation of design features, the proposed Project would not increase flows to the drainage system over existing conditions such that existing upstream capacity issues would be exacerbated during the Capital Flood event. Therefore, the proposed Project would not result in an increase in runoff that would cause or exacerbate flooding or result in erosion/siltation, and impacts on drainage would be less than significant.

#### *Water Quality - Wet and Dry Weather Pollutant Loads*

Under the proposed Project, the impervious surface area at the Project site would increase from 12 to 68 acres, resulting in an increase in stormwater runoff from the Project site. Under the proposed Project, aircraft maintenance, washing and parking activities would replace the existing staging activities. The proposed Project's uses have the potential to increase pollutant concentrations in on-site stormwater flows. However, in accordance with LAX Master Plan Commitment *HWQ-1, Conceptual Drainage Plan*, and applicable regulations, the proposed Project would incorporate site-specific BMPs into a Project-specific Standard Urban Stormwater Mitigation Plan (SUSMP) during the design phase of the proposed Project. Preliminary site-specific BMPs identified in the proposed Project's Drainage Design Report include a detention/infiltration basin, oil-water separators, media filters, a water recycling system, porous pavement, and hangar roof drains. All BMPs would be required to be designed in accordance with the LAWA Design and Construction Handbook, which requires projects to be in compliance with the City's Low Impact Development (LID) Ordinance and includes technical approaches and BMPs to reduce stormwater pollutants in first-flush flows.

Since the proposed Project would be required to comply with the MS4 permit (through identification of project-specific BMPs in a SUSMP that serve to avoid a net increase in pollutant loading), it is not anticipated that the Alternative would result in additional wet-weather pollutant loading of 303(d)-listed water bodies and associated impacts would be less than significant. Regarding dry weather pollutant loads, the same site-specific BMPs utilized to treat stormwater flows would also reduce pollutant loading in dry weather flows, and as a result the proposed Project would result in a less than significant impact with regard to dry weather flows.

#### *Groundwater*

The proposed Project would not include new water production wells which could impact groundwater supply. Implementation of the proposed Project would result in a corresponding decrease in the on-site volume of surface recharge to groundwater, from an estimated 17.76 acre-feet per year (AFY) under existing conditions to 3.84 AFY under the proposed Project. This reduction in surface recharge would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge as the Project site only represents a negligible contribution (0.2 percent) to groundwater inflows under existing conditions and the reduction would represent a 0.21 percent reduction in the total average annual inflows to the West Coast Groundwater Basin. This estimated reduction does not take into account the proposed Project's detention/infiltration basin, which would infiltrate a portion of the stormwater that currently infiltrates to the groundwater table at the Project site. Moreover, this estimate is conservative in that it does not take into account that the existing 72 acres of pervious surface area on the

Project site are compacted to an imperviousness of 60 percent from staging and stockpiling efforts currently ongoing at the Project site. The negligible reduction in groundwater recharge that would occur under the proposed Project would not interfere with the productivity of pre-existing water wells as no water production wells occur in the vicinity and groundwater under LAX is not utilized for the identified beneficial uses of the West Coast Groundwater Basin (i.e., municipal, agricultural, industrial). Therefore, the proposed Project's impacts on groundwater supply and recharge would be less than significant.

### **Cumulative Impacts**

As discussed in Section 4.4, *Hydrology and Water Quality*, of the Draft EIR, implementation of the related projects within the vicinity of the proposed Project are not anticipated to result in significant cumulative hydrology or water quality impacts. It should be noted that, for hydrology, the related projects would be reviewed by the lead agencies for those projects (e.g., the applicable departments of LAWA, City of Los Angeles, and Los Angeles County) on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

For water quality, as with the proposed Project, the related projects would be subject to State National Pollutant Discharge Elimination System permit requirements for both construction and operation which have been formulated to avoid significant water quality impacts. In addition, each project greater than one-acre in size would be required to develop a SWPPP/SUSMP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to water quality. Moreover, with adherence to applicable regulations and the implementation of LAX Master Plan Commitment *HWQ-1, Conceptual Drainage Plan*, and LAX Master Plan Mitigation Measure *MM-HWQ-1, Update Regional Drainage Facilities*, the proposed Project would not generate an incremental increase in either peak stormwater runoff or pollutants of concern and thus would not contribute to any potential hydrology and water quality impacts of the related projects if such impacts were to occur. Finally, groundwater in the Project vicinity is not utilized as a domestic water supply and the proposed Project would only negligibly reduce groundwater recharge within the West Coast Groundwater Basin. Therefore, cumulative hydrology and water quality impacts would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.4, *Hydrology and Water Quality*, of the Draft EIR, the BOAC hereby finds and determines that construction and operation of the proposed Project with incorporation of LAX Master Plan Commitment *HWQ-1, Conceptual Drainage Plan* and LAX Master Plan Mitigation Measure *MM-HWQ-1, Update Regional Drainage Facilities*, would have a less than significant impact to hydrology and water quality. Therefore, mitigation beyond that already provided under the LAX Master Plan Commitments and Mitigation Measures are not required to address the less than significant hydrology and water quality impacts. The applicable LAX Master Plan Commitments and Mitigation Measures identified in Section 4.4, *Hydrology and Water Quality* will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that hydrology and water quality impacts would be less than significant. No further mitigation measures are required.

### **e. Noise**

Description of Effects: Section 4.5, *Noise*, of the Draft EIR analyzed potential impacts from construction and operational noise and ground-borne vibration from construction activities that would result from the development of the proposed Project.

The following three LAX Master Plan Commitments and four LAX Master Plan Mitigation Measures are applicable to the proposed Project: *N-1, Maintenance of Applicable Elements of Existing Aircraft Noise Abatement Program*, *Surface Transportation (ST)-16, Designated Haul Routes*, *Surface Transportation (ST)-22, Designated Truck Routes*, *MM-N-7, Construction Noise Control Plan*, *MM-N-8, Construction Staging*, *MM-N-9, Equipment Replacement*, and *MM-N-10, Construction Scheduling* were considered in the noise analysis. Although the noise control

measures are applicable to the proposed Project and would be implemented during the course of Project implementation, the noise impacts analysis presented in Section 4.5, *Noise*, of the Draft EIR did not take credit for noise reductions associated with these measures. As such, the noise impacts analysis in the Draft EIR is considered to be conservative.

Subsequent to circulation of the Draft EIR, the following PDFs, *WAMA-PDF-1 through WAMA-PDF-7*, are Project elements that LAWA has voluntarily chosen to include within the lease terms for all future tenants of the Project site, or as part of operation of the proposed Project. The PDFs are included to address community concerns and are not triggered or warranted by any significant impacts of the WAMA project (i.e., are not mitigation measures). Notwithstanding, the lease terms and design elements described below will be made requirements as part of the proposed Project and will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program as a means to confirm they have been included in the WAMA tenant leases or, in the case of the automated run-up monitoring system described below, has been included in final design plans for the Project.

***WAMA-PDF-1 Quarterly Reporting:*** The tenants of the WAMA site will be required to provide to LAWA a quarterly report indicating the number, time of day, duration, and specific aircraft type of all aircraft engine high-power and low-power ground run-ups conducted during the reporting period. This reporting requirement shall also extend to any airline using the WAMA site for ground run-ups as shall be monitored by LAWA Airfield Operations. The completeness and accuracy of the report shall be attested to by a company official of the tenant.

In conjunction with application of a ground run-up reporting program, LAWA will develop a tiered penalty program applicable to violations of the LAX nighttime curfew for aircraft engine high-power ground run-ups. The penalty structure will be modeled after policies seen at other similarly situated airports (e.g., Seattle Tacoma International Airport). An example of the penalty structure includes: a Letter of Admonishment for first offense within a one year period and fines for second, third and additional offences within a one year period. It is anticipated that LAWA's development of a financial penalty program, to the extent allowed by law, will be tiered, whereby the amount of financial penalty is progressively higher for each recurring violation, with a substantial increase in penalty amounts for repeat violations that occur within a short amount of time.

***WAMA-PDF-2 APU Usage While Aircraft is Parked:*** Aircraft parked at the WAMA site shall not utilize on-board auxiliary power units (APUs) for aircraft electrical power or interior cooling at parking spaces where ground power and preconditioned air are available, with the exceptions being: (1) if an APU is being serviced or checked relative to those functions; or (2) for some limited time if APU is required to tug/tow aircraft to/from WAMA site (i.e., for proper operation of essential on-board electronics while being moved). In addition to the proposed RON kits with ground power and preconditioned air for aircraft parking positions along the perimeter of the site (i.e., at hangar areas along World Way West and RON/RAD positions along Pershing Drive), the final WAMA site design will include additional aircraft ground power connect ports at the two interior RON/RAD positions within the site.

***WAMA-PDF-3 Aircraft Taxiing:*** All aircraft traveling to or from WAMA during nighttime hours (11:00 p.m. to 6:00 a.m.) must be tugged/towed and are not allowed to taxi under own power, unless otherwise directed by LAWA Airport Operations in situation-specific circumstances where taxiing is required to maintain airfield safety and efficiency.

***WAMA-PDF-4 Aircraft Engine Ground Run-Ups:*** Aircraft engine high-power ground run-ups of any duration and low-power run-ups of five minutes or more can only occur at the onsite blast fence; and, all run-ups (high-power and low-power of any duration) are prohibited anywhere on the WAMA site between 11:00 p.m. and 6:00 a.m.

***WAMA-PDF-5 Use of the WAMA Site:*** Aircraft parking spaces at WAMA site cannot be used for passenger boarding or deplaning (i.e., cannot be used as remote gates), except during or as a result of emergency circumstances.

**WAMA-PDF-6 Automated Run-Up Monitoring System:** An aircraft engine ground run-up monitoring system, including a sound level meter and video camera, will be provided at the run-up area. LAWA will make all reasonable efforts to make data from the monitoring system accessible to the public via an internet link provided on LAWA's website (i.e., lawa.org).

### **Construction Related Impacts**

#### *On-Site Construction Noise*

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations: demolition, excavation, foundation, vertical construction, and paving. Construction noise associated with the proposed Project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing. As shown in Table 4.5-3, within Section 4.5, *Noise*, of the Draft EIR, the highest noise level predicted to occur at the nearest noise-sensitive receptor location in the City of El Segundo during construction would be 59 dBA during the paving phase. Noise levels during all other phases and for all other receptor locations evaluated would be less than 59 dBA. The nearest noise sensitive receptors located north of the Project site in Westchester in the City of Los Angeles are more than 4,000 feet away from the Project site. For all of the noise sensitive receptor locations construction-related noise would not exceed existing ambient noise levels by 5 dBA. These noise levels would be under the noise thresholds of significance as set forth in the City's L.A. CEQA Thresholds Guide. Therefore, impacts from on-site construction would be less than significant.

#### *Off-Site Construction Noise*

Delivery and haul trucks would enter the Project site via Pershing Drive and leave the site via the same driveway. Vehicles are expected to use Imperial Highway to access the regional freeway system (I-405 and I-105), as needed. As analyzed in Section 4.5, *Noise*, of the Draft EIR, construction haul trucks would not exceed the existing ambient noise by 5 dBA in close proximity of the construction site. As such, construction haul truck related noise would result in a less than significant noise impact.

#### *Construction Vibration*

The primary and most intensive vibration source associated with the development of the proposed Project would be associated with the use of dozers during construction. The nearest sensitive receptors to the Project site are approximately 1,550 feet to the south (in the City of El Segundo). At 1,550 feet, the vibration levels would attenuate to less than 35 vibration decibels (VdB). A vibration level of less than 35 VdB is below the Federal Transportation Administration (FTA) vibration threshold of significance (i.e., 72 VdB to 80 VdB) and, therefore, construction vibration impacts would be less than significant.

### **Operation Related Impacts**

#### *Aircraft Engine Run-up Activity*

As discussed in Section 4.5, *Noise*, of the Draft EIR, community noise equivalent level (CNEL) noise level changes from run-up activity would be between -0.1 dB and 0.2 dB. Therefore, noise level increases would be less than 1.5 dB CNEL at or above 65 dB CNEL, compared to existing conditions and impacts would be less than significant.

#### *Taxi Operation Noise*

As analyzed in Section 4.5, *Noise*, of the Draft EIR, the Project-related CNEL values would increase the existing CNEL in Westchester by approximately 0.04 dB and increase the existing

CNEL in El Segundo by approximately 0.05 dB.<sup>1</sup> In both cases, the increase would not substantially increase average hourly ambient nighttime noise levels and would be substantially less than the threshold of significance of a 1.5 dB CNEL increase at or above 65 dB CNEL; hence, the increased Project-related taxiing noise impact would be less than significant.

### *Operational Maintenance Noise*

The proposed Project would include areas for tool storage and welding. As analyzed in Section 4.5, *Noise*, of the Draft EIR, noise from operational maintenance activity would not result in noise-sensitive receptors being newly exposed to 65 dBA CNEL or result in an increase of 1.5 dBA CNEL or more in areas currently exposed to 65 dBA CNEL. Therefore, Project-related maintenance noise impacts would be less than significant.

### **Cumulative Impacts**

#### *Construction Noise*

The nearest related project in proximity to the proposed Project that is anticipated to be under construction at the same time as the Project is the Runway Safety Area (RSA) Improvements-South Airfield. The highest construction noise level at the nearest noise-sensitive receptor in El Segundo is projected to be 63 dBA. When added to the highest estimated noise level for construction of the proposed Project, the combined noise level would be approximately 64 dBA, which is well below the applicable threshold of significance. The next closest related projects, the Midfield Satellite Concourse: Phase 1 – North Concourse Project and the LAX Bradley West Project Remaining Work, are much farther away which based on that distance would not generate construction noise levels such that when combined with those of the proposed Project and the RSA Improvements-South Airfield project, would result in significant cumulative noise impacts to the nearest noise-sensitive receptor. As such, cumulative impacts associated with construction noise would be less than significant.

With respect to off-site construction traffic, according to the traffic study report, the proposed Project would not result in an average daily volume of construction traffic that would result in a cumulative considerable contribution to traffic noise. Therefore, cumulative impacts would be less than significant.

#### *Construction Vibration*

Similar to construction noise, vibration from construction of the proposed Project and related projects would be localized to within a few hundred feet from the construction site. Vibration levels from a large dozer would attenuate to below the FTA perception level of 65 VdB at approximately 150 feet, which is well below the threshold of significance of 72 VdB to 80 VdB. Given that the nearest related project, the RSA Improvements-South Airfield project and both projects are each more than 1,300 feet from the nearest sensitive receptor, it is not anticipated that there would be combined construction vibration impacts; hence, cumulative impacts associated with construction vibrations would be less than significant.

#### *Operational Noise*

Operations-related increases in existing CNEL levels, estimated at nearby noise-sensitive receptors, resulting from implementation of the proposed Project would include a maximum of 0.2 dBA increase associated with run-up activity, a 0.05 dBA increase associated with aircraft taxiing, and maximum of 0.2 dBA increase from aircraft maintenance activities. These increases, individually and collectively, would be substantially less than the threshold of significance (i.e., 1.5 dBA CNEL increase at or above 65 dB CNEL). Of the related projects, the one with the most

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<sup>1</sup> Section 4.5, *Noise*, of the Draft EIR, indicated that the existing CNEL in El Segundo would increase by approximately 0.07 dB. In preparation of the Final EIR that number was found to be incorrect and a correction was made in Chapter 3, *Corrections and Additions to the Draft EIR*. The correct number is being used in this Findings document.

potential to result in operations-related changes to existing CNEL levels at the nearest sensitive noise-receptors also affected by the proposed Project would be the RSA Improvements-South Airfield project. Other related projects are not expected to have a notable contribution to cumulative operational noise impacts. As analyzed in Section 4.5, *Noise*, of the Draft EIR, the increase in noise related to the RSA Improvements-South Airfield project in combination with the increases described above for the proposed Project would not result in a 1.5 dBA increase in the existing ambient noise level for the affected area. Therefore, cumulative impacts associated with operational noise would be less than significant.

**Findings:** Based on substantial evidence in the administrative record, including Section 4.5, *Noise*, of the Draft EIR, the BOAC hereby finds and determines that noise impacts related to the proposed Project would be less than significant. To address community concerns, LAWA will require that the tenants abide by the design elements and requirements contained in *WAMA-PDF-1 through WAMA-PDF-7*, which will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project. As described earlier, PDFs are included to address community concerns and are not triggered or warranted by any significant impacts of the WAMA project (i.e., are not mitigation measures).

The applicable LAX Master Plan Commitments and Mitigation Measures identified in Section 4.5, *Noise*, of the Draft EIR: specifically, *ST-16, Designated Haul Routes, ST-22, Designated Truck Routes, MM-N-7, Construction Noise Control Plan, MM-N-8, Construction Staging, MM-N-9, Equipment Replacement, MM-N-10, Construction Scheduling, and N-1, Maintenance of Applicable Elements of Existing Aircraft Noise Abatement Program*, would also be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program. No further mitigation measures are required.

### **f. Land Use and Planning**

**Description of Effects:** As discussed in Section 4.6, *Land Use and Planning, of the Draft EIR*, the plan consistency evaluation contained in the Draft EIR focused on potential conflicts between the proposed Project and existing land use plans, policies, and regulations adopted to avoid or mitigate environmental effects. Determinations of significance are based not on inconsistency alone, but on instances where inconsistencies with plans, policies, and regulations also result in physical impacts on the environment. One LAX Master Plan Commitment pertaining to land use and planning, *LU-4, Neighborhood Compatibility Program*, is applicable to the proposed Project.

#### **Consistency with Land Use Plans**

##### *LAX Master Plan*

As discussed in Section 4.6, *Land Use and Planning*, of the Draft EIR, the LAX Master Plan allowed for the replacement of existing hangars through the construction of three hangar/maintenance facilities dispersed in the western portion of the airport. The proposed Project represents a refinement to the programmed development of hangar/maintenance facilities in the western portion of the airport property. Specifically, the proposed Project would exchange locations identified for aircraft apron and maintenance on the east side of Taxiway AA with an area identified for employee parking (West Employee Parking) on the west side of Taxiway AA. Under the LAX Master Plan, both facilities are proposed for the southwest portion of the airport property, south of World Way West with access routes to and from each facility remaining essentially unchanged. Neither these refinements nor construction of the proposed Project as a whole, would affect the number of aircraft operations at LAX, which is determined by market demand and supply considerations.

The changes in the locations of the Proposed Maintenance Facility and West Employee Parking area would not materially change the conceptual framework for development in the Project area as set forth in the LAX Master Plan Program. The proposed Project would be consistent with the LAX Master Plan Program by providing an aircraft maintenance area in the southwest portion of

the airport. While the proposed Project would result in a slightly different configuration and would exchange the location of the West Employee Parking area, it would not change the size and number of parking spaces proposed or otherwise constrain future development of the facility as envisioned in the LAX Master Plan Program. The proposed Project would not increase passenger or gate capacity and would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions or to what is assumed under the LAX Master Plan Program. Furthermore as discussed in Section 4.6, *Land Use and Planning*, of the Draft EIR, shifts in facility locations related to Air Quality, Greenhouse Gas Emissions, Hydrology and Water Quality, Hazards and Hazardous Materials, Noise, and Construction Surface Transportation would not materially change what was assumed and evaluated in the LAX Master Plan EIR. Furthermore, implementation of the proposed Project at the proposed site at this time would also support improvement of existing groundwater quality, more so than the originally proposed LAX Master Plan improvements, by shifting the near-term development of the maintenance hangar and apron area westward; thereby avoiding interference with or delays in completing the groundwater remediation occurring at the existing American Airlines employee parking area

As such, the proposed Project would not conflict with the general intent of the LAX Master Plan Program and the associated shifts in facility locations at the west end of the airport would not result in significant physical land use impacts on the environment.

#### **LAX Plan**

The proposed Project would be consistent with the land use designations the goals and corresponding policies of the LAX Plan that are relevant to the proposed Project. Specifically, the proposed Project would not increase existing gate capacity, passengers, flights, and/or aircraft operations at LAX. The proposed Project would also upgrade, consolidate, and modernize maintenance facilities, allowing for more efficient aircraft maintenance operations at LAX, supporting LAX Plan policies related to the efficient and effective use of airport facilities. The proposed Project would also provide updated maintenance facilities to accommodate modern aircraft types and the next generation of quieter jets; an identified policy and program in the LAX Plan.

#### **LAX Specific Plan**

The proposed aircraft parking and maintenance facilities, employee parking areas, and related storage, equipment and facilities that would be developed under the proposed Project are consistent with the corresponding LAX-A Zone: Airport Airside Sub-Area as shown on the LAX Specific Plan. Therefore, impacts would be less than significant.

#### **Airport Layout Plan (ALP)**

The ALP shows facility locations reflected in the conceptual development framework of the LAX Master Plan Program. The existing ALP for LAX shows the Project site as a proposed employee parking area, with an area identified for an aircraft maintenance building directly east of the site. As one of the federal actions associated with the more detailed design and development plan for the proposed Project, the ALP would need to be updated. These changes would reflect the exchange in the locations of facilities described above, including the locations and configurations of the Proposed Maintenance Facility and West Employee Parking, the CNG/LNG fueling station, and the consolidation of the three planned aircraft maintenance hangar facilities to the Project site. FAA approval of the updated ALP for LAX is required. These changes would not result in significant impacts on the environment and would not impede implementation of the uses planned for the west end of the airport that are shown in the ALP. LAWA submitted a proposed ALP amendment request with these changes to FAA for its consideration in July 2013.

#### **Cumulative Impacts**

The proposed Project would be consistent with the LAX Plan, LAX Specific Plan, and would not conflict with the LAX Master Plan and ALP (as amended). Although several related projects,

such as the Midfield Satellite Concourse Project, LAX Specific Plan Amendment Study Development and the LAX Northside Area Development, are planned in the area, they would be required to comply with land use designations, zoning requirements, and other applicable land use plans or seek modifications to such plans. This would require that potential impacts on land use be evaluated and any associated significant impacts mitigated to the degree feasible. Therefore, cumulative impacts associated with consistency with land use plans would be less than significant.

Findings: Based on substantial evidence in the administrative record, including Section 4.6, *Land Use and Planning*, of the Draft EIR, the BOAC hereby finds and determines that the proposed Project would have a less than significant impact to land use and planning. The applicable LAX Master Plan Commitment *LU-4, Neighborhood Compatibility Program* would be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program. No further mitigation measures or commitments are required.

### **g. Construction Surface Transportation**

Description of Effects: As analyzed in Section 4.7, *Construction Surface Transportation*, of the Draft EIR, construction of the proposed Project would generate vehicle trips on the local roadway system, I-405, and I-105 in the vicinity of LAX during construction, resulting from workers traveling to and from the project area and from trucks transporting materials and equipment.

As analyzed in the Initial Study prepared for the proposed Project, the future operation of the proposed Project would not result in long-term operational changes to traffic activity and traffic flows within the Airport study area as, in the long-term, the proposed Project would not increase the number of employees or airline passengers traveling to/through LAX. Therefore, an operational analysis of future traffic activity associated with proposed Project operations was not evaluated in the Draft EIR (see the Initial Study, Appendix A of the Draft EIR).

### **Construction Surface Transportation Impacts**

As discussed in Section 4.7, *Construction Surface Transportation*, of the Draft EIR, the peak construction period for the proposed Project is anticipated to occur around August 2014. It was estimated that approximately 21 percent of the construction-related traffic would access the Airport from I-405 north, 23 percent from I-405 south, 32 percent from the east (I-105), and 24 percent from local roadways.

Potential traffic-related impacts were assessed by conducting two impact comparisons which include:

(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.

(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.

LAX Master Plan Commitments and Mitigation Measures that pertain to construction surface transportation and that are applicable to the proposed Project include: C-1, *Establishment of a Ground Transportation/Construction Coordination Office*, C-2 *Construction Personnel Airport Orientation*, ST-9, *Construction Deliveries*, ST-12, *Designated Truck Delivery Hours*, ST-14, *Construction Employee Shift Hours*, ST-16, *Designated Haul Routes*, ST-17, *Maintenance of Haul Routes*, ST-18, *Construction Traffic Management Plan*, and ST-22, *Designated Truck Routes*. These LAX Master Plan Commitments and Mitigation Measures were incorporated into the construction surface transportation analysis for the proposed Project.

Subsequent to circulation of the Draft EIR, the following PDF, *WAMA-PDF-7*, was added by LAWA as a Project element to voluntarily err to address concern about the degradation of Imperial Highway related to hauling and construction activity and is not triggered or warranted by any significant impacts of the WAMA project (i.e., are not mitigation measures). Notwithstanding, the following elements will be made a requirement as part of the proposed Project and will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program.

***WAMA-PDF-7 Resurfacing a Portion of Imperial Highway:*** LAWA will work with City of Los Angeles Bureau of Street Services (LABSS) to contribute its reasonable allocable share subject to FAA approval toward resurfacing of Imperial within the City of Los Angeles's jurisdiction; if the LABSS undertakes this resurfacing project, LAWA will also work with LABSS and the Council District 11 office to schedule resurfacing work. LAWA commits to meetings with Caltrans (alongside the City of El Segundo) to discuss improvements to areas under Caltrans control but cannot make any guarantees as to Caltrans' actions.

As described in Section 4.7, *Construction Surface Transportation*, no significant construction-related traffic impacts would occur under the Baseline Plus Project condition or Cumulative Plus Project condition for the proposed Project. Therefore, no Project-specific mitigation measures were required.

Findings: Based on substantial evidence in the administrative record, including Section 4.7, *Construction Surface Transportation*, of the Draft EIR, the BOAC hereby finds and determines that the proposed Project would not have significant construction surface transportation impacts. The BOAC hereby adopts the conclusions regarding less than significant surface transportation impacts. To address community concerns, LAWA will require *WAMA-PDF-7* be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project. As described earlier, the PDF is included to address community concerns and are not triggered or warranted by any significant impacts of the WAMA project (i.e., is not a mitigation measure). Applicable LAX Master Plan Commitments and Mitigation Measures and Commitments and identified in Section 4.7, *Construction Surface Transportation*, of the Draft EIR, will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program for the proposed Project and would ensure that surface transportation impacts would be less than significant. No further mitigation measures are required.

**C. Less than Significant Impacts Identified in the Initial Study**

Description of Effects: The Initial Study prepared for the proposed Project (Appendix A of the Draft EIR) evaluated potential impacts on a range of subjects listed in Appendix G of the CEQA Guidelines. The analysis conducted for the Initial Study determined that no impact would occur relative to Agricultural and Forest Resources, Mineral Resources, and Recreation. The Initial Study also determined that the impact of the proposed Project with respect to Aesthetics, Biological Resources, Geology and Soils, Population and Housing, Public Services, and Utilities and Service Systems would be less than significant.

The Initial Study also determined that potentially significant impacts with respect to the discovery of unknown archaeological and paleontological resources, and human remains, during Project

construction would be reduced to a less than significant level with the implementation of the following LAX Master Plan Mitigation Measures:

**Mitigation Measure ARCHAEO-1:** Prior to initiation and construction activities, LAWA will retain an on-site Cultural Resources Monitor (CRM), as defined in the LAX Master Plan Mitigation Monitoring and Reporting Program (MMRP) Archaeological Treatment Plan (ATP), who will determine if the project site is subject to archaeological monitoring. As defined in the ATP, areas are not subject to archaeological monitoring if they contain redeposited fill or have previously been disturbed. LAWA shall retain an archaeologist to monitor excavation activities in native or virgin soils in accordance with the detailed monitoring procedures and other procedures outlined in the ATP regarding treatment for archaeological resources that are accidentally encountered during construction. In accordance with the methods and guidelines provided in the ATP, the CRM will compare the known depth of redeposited fill or disturbance to the depth of planned grading activities, based on a review of construction plans. If the CRM determines that the Project site is subject to archaeological monitoring, a qualified archaeologist (an archaeologist who satisfies the Secretary of the Interior's Professional Qualifications Standards [36 CFR 61]) shall be retained by LAWA to inspect excavation and grading activities that occur within native material. The extent and frequency of inspection shall be defined based on consultation with the archaeologist. Following initial inspection of excavation materials, the archaeologist may adjust inspection protocols as work proceeds. Identification, evaluation, and recovery of cultural resources shall be conducted in accordance with the methods, guidelines, and measures established in the ATP. If Native American cultural resources are encountered, LAWA shall comply with guidance established in the ATP for retaining a Native American monitor. If human remains are found, LAWA shall comply with the State Health and Safety Code regarding the appropriate treatment of those remains as outlined in the ATP. Reporting shall be completed in conformance with the requirements established in the ATP to document the archaeological monitoring effort and guidance as to the proper curation and archiving of artifacts in accordance with industry and federal standards.

**Mitigation Measure PALEO-1. Conformance with LAX Master Plan Paleontological Management Treatment Plan: (PMTP):** Prior to the initiation of grading and construction activities, LAWA will retain a professional paleontologist, as defined in the Final LAX Master Plan MMRP PMTP, who will determine if the Project site exhibits a high or low potential for subsurface resources. If the Project site is determined to exhibit a high potential for subsurface resources, paleontological monitoring will be conducted in accordance with the procedures stipulated in the PMTP. If the Project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP. In the event that paleontological resources are discovered, the procedures outlined in the PMTP for the identification of resources will be followed to ensure that unique paleontological resources are studied and treated in accordance with applicable regulations and procedures such that significant impacts are avoided.

**Mitigation Measure PALEO 2. Construction Personnel Briefing:** In accordance with the PMTP, construction personnel will be briefed by the consulting paleontologist in the identification of fossils or fossiliferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur.

**Findings:** Based on substantial evidence in the administrative record, including the Initial Study, provided as Appendix A of the Draft EIR, the BOAC hereby finds and determines that construction and operation activities would be less than significant with respect to Aesthetics, Agricultural and Forest Resources, Biological Resources, Cultural Resources, Geology and Soils, Mineral Resources, Population and Housing, Public Services, Recreation, and Utilities and Service Systems. The Initial Study requires no further action or mitigation measures with respect to these resources or the findings of the Initial Study. Although archaeological, paleontological and human remains are not expected to be found during Project construction, LAX Master Plan Mitigation Measures associated with discovery of unknown archaeological and paleontological

resources will be included in the Project Design Features, Commitments, and Mitigation Monitoring and Reporting Program to further ensure a less than significant impact (as described in the Initial Study). The BOAC hereby adopts the conclusions regarding less-than-significant construction- and operation-related impacts on these environmental subject areas.

**D. Findings on Project Alternatives**

**a. Alternatives Considered and Rejected**

**West Remote Pads/Gates Site**

The West Remote Pads/Gates Site is located just north of the proposed Project Site and is bounded to the south by World Way West, to the north by Taxiway D, to the west by Pershing Drive, and to the east by Taxiway AA. The West Remote Pads/Gates site is currently utilized as an apron/gate area for on-loading and off-loading of international and domestic flights that cannot be handled in the Central Terminal Area (CTA). Passengers are ferried to and from the site by buses. The apron area is also utilized for RON and RAD parking of aircraft when the gates are not in use. The West Remote Pads/Gates site can accommodate 11 aircraft at apron gates having jet loading bridges and another 7 hardstand (pads) without loading bridges, for a total of 18 positions. Additional aircraft are double- and sometimes triple-parked at some of these positions during overnight and early morning hours.

A large maneuvering area is located in the southwest quadrant of this Alternative site. This maneuvering area also serves as an operational readiness area for “super-jumbo” aircraft such as the Antonov AN-124 cargo carrier, which has called on LAX in the past. Additionally, this space is utilized for RON/RAD for highly secure visits by public and government officials that at times require staging of military cargo and other large aircraft. Although the West Remote Pads/Gates site was investigated in whole and in part as an alternative location for the proposed Project, it was not carried forward for further analysis because the site is highly utilized for passenger gate facilities and for aircraft parking (i.e., RON/RAD), including special-purpose use (i.e., super-jumbo aircraft parking and high-security areas) and would not be available for use during the time frame required for development of the proposed Project.

The timing for the proposed Project, with the first hangar constructed in 2015 and the second hangar constructed by 2019, is necessary to help consolidate and replace maintenance facilities and hangars that have been removed, or are planned for removal within the next several years consistent with the LAX Master Plan.

Findings: In light of the above, the BOAC hereby rejects the West Remote Pads/Gates site from further consideration in the EIR and finds that it is infeasible and would not be available for use during the time frame required for development of the proposed Project.

**Other LAX Sites**

In addition to the West Remote Pads/Gates site that was considered but not carried forward for further analysis, and the Alternate Site Alternative in the eastern portion of LAX that is evaluated in the Draft EIR other areas on the airport property were also considered for analysis. However, other sites at LAX were not carried forward for analysis as they were either not available for development, or were located in areas without feasible access and proximity to runways and taxiways.

**b. Alternatives Carried Forward for Full Evaluation**

**No Project-No Development Alternative**

Under the No Project-No Development Alternative, development of a consolidated aircraft maintenance facility with aircraft parking apron areas, maintenance hangars, employee parking areas, and related storage, equipment and facilities would not occur at all. The proposed Project site would continue to be used as a staging area for airport construction projects, with modular

construction trailers/offices, a surface parking area, an airfield access security post (Guard Post 21), a small LAWA Police Department/Transportation Security Administration (LAWAPD/TSA) canine “walk” area, paved roads, and outdoor loading and storage areas. In addition, material would continue to be stockpiled on the site in association with projects under construction at LAX. Thus, the physical conditions associated with the site and its activities would remain essentially the same as under current conditions.

As the Project-No Development Alternative would not involve any construction; it would not have the significant unavoidable impact that would occur under the proposed Project with respect to construction-related regional NOX emissions. However, without the proposed Project, there would be less ability to efficiently and effectively maintain ADG VI aircraft and other aircraft at LAX. The need for maintenance facilities removed by past and pending projects as contemplated under the LAX Master Plan (such as Taxiway T) would be accommodated to the extent feasible at various maintenance facilities already in use on the airport, with potential for some maintenance having to be accommodated at other airports. Other existing aircraft maintenance facilities at LAX are currently used on a regular basis by the tenant airlines/companies, and it is unlikely existing facilities could accommodate the aircraft maintenance needs. It is possible that the remaining facilities would not be able to accommodate the increased demands completely and/or efficiently. This is especially true relative to the ability to accommodate the existing RON/RAD areas associated with the removal of aircraft maintenance hangars that would be removed. There are already substantial demands on existing RON/RAD areas at LAX and the loss of RON/RAD spaces would exacerbate that problem. Given that the RON/RAD areas at the subject maintenance areas are used for aircraft cabin cleaning and light servicing/maintenance (i.e., “Level A checks”), the loss of those areas would mean that such aircraft servicing and light maintenance would need to be done while aircraft are at the gate, which would extend gate occupancy time and possibly delay other aircraft waiting to use the gate, or require additional stacking of aircraft at the remaining RON/RAD areas, which hinders the efficient management and movement of aircraft in those areas

Findings: For reasons discussed above, the BOAC hereby rejects the No Project-No Development Alternative as it would not meet any of the proposed Project’s objectives. Specifically, the No Project-No Development Alternative would not meet the proposed Project’s objective to support the improvement and modernization of aircraft maintenance facilities at LAX and to accommodate larger, newer generation aircraft. The No Project-No Development Alternative Project would also not develop aircraft maintenance hangars and aircraft parking areas within close proximity on the same site, which is counter to the objective of providing efficient and effective use of airport facilities. The No Project-No Development Alternative would also not support consistency with the LAX Master Plan, which provides for an aircraft maintenance area to be developed in the southwest portion of the airport to help replace maintenance facilities that were removed in conjunction with LAX Master Plan improvements.

### **No Project-Existing LAX Master Plan Alternative**

Under the No Project-Existing LAX Master Plan Alternative, development of aircraft maintenance facilities in the southwestern portion of the airport with aircraft parking apron areas, maintenance hangars, employee parking areas, and related storage, equipment and facilities would occur in a manner that replicates the exact program locations presented in the 2004 LAX Master Plan without the currently proposed Project refinements. Under this Alternative, a new 270,000-square foot aircraft maintenance hangar would be constructed just east of Taxiway AA to the west of the existing United-Continental Hangar, with a new aircraft apron area placed between the new hangar and Taxiway C. The former Continental Airlines training building, which is now vacant, would be demolished and rebuilt as a 23,000 square foot ancillary building. Employee parking and maintenance-related storage/staging would be provided between the new hangar and the new ancillary building. Additionally, this Alternative would include another new maintenance hangar, approximately 25,000 square feet in size, located between the United-Continental

## **CEQA Findings – West Aircraft Maintenance Area Project**

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Hangar and the American Airlines High-Bay Hangar. The new hangar and associated apron area would likely be developed immediately southwest of the new Aircraft Rescue and Firefighting Facility replacing two to three of the existing aircraft RON parking positions on the west side of Taxiway R.

Overall, this Alternative would have similar impacts as compared to the proposed Project as it would also have a significant impact and would exceed the regional significance threshold for NO<sub>x</sub> during construction even with implementation of control measures.

While No Project-Existing LAX Master Plan Alternative would be consistent with the LAX Master Plan by providing an aircraft maintenance area in the southwest portion of the airport, this Alternative would not as effectively consolidate and modernize existing aircraft maintenance facilities that would serve existing aircraft needs at LAX, including new facilities that have been or will be replaced in conjunction with the LAX Master Plan. In addition, this Alternative also would only partially support the proposed Project's objective to provide maintenance and aircraft parking areas that meet the needs of existing aircraft at the airport, including modern ADG VI aircraft. Furthermore, the No Project-Existing LAX Master Plan Alternative would involve development above a groundwater contamination plume. This would have the potential to substantially limit the ability to continue to monitor, maintain, and service much of the existing VEFPR groundwater remediation system in the area, which could delay groundwater clean-up efforts and pose a significant constraint to development of maintenance facilities at that location such that the proposed Project's objectives might not be attained.

Findings: For reasons discussed above, the BOAC hereby rejects the No Project-Existing LAX Master Plan Alternative. Significant impacts would not be reduced as this alternative would exceed the regional significance threshold for NO<sub>x</sub> during construction even with implementation of control measures. The No Project-Existing LAX Master Plan Alternative would not as effectively consolidate and modernize existing aircraft maintenance facilities that would serve existing aircraft needs at LAX, including new facilities that have been or will be replaced in conjunction with the LAX Master Plan. In addition, this Alternative also would only partially support the proposed Project's objective to provide maintenance and aircraft parking areas that meet the needs of existing aircraft at the airport, including modern ADG VI aircraft.

Furthermore, the No Project-Existing LAX Master Plan Alternative would have the potential to substantially limit the ability to continue to monitor, maintain, and service much of the existing VEFPR groundwater remediation system in the area, which could delay groundwater clean-up efforts and pose a significant constraint to development of maintenance facilities at that location such that the proposed Project's objectives might not be attained. Significant impacts would not be reduced as this alternative would exceed the regional significance threshold for NO<sub>x</sub> during construction even with implementation of control measures.

### **Reduced Project Alternative**

The Reduced Project Alternative would eliminate one of the two aircraft maintenance hangars proposed for the Project along with 150 associated employee parking spaces, and would reduce the proposed aircraft apron area by approximately half. The site would be able to accommodate up to eight ADG VI aircraft, or a mix of smaller aircraft, compared to the 10 ADG VI aircraft that could be accommodated under the proposed Project. All of the existing stockpiles would still be removed; however, existing uses within the northeast portion of the proposed Project site would remain, including the existing construction trailers/offices area, which would continue to be used for coordination of terminal improvements, unrelated to activities occurring on the Project Site, Guard Post 21, and the LAWAPD/TSA canine "walk" area.

Although implementation of the Reduced Project Alternative would result in less development, this Alternative would still result in similar maximum daily emissions given that the intensity of construction activity would likely remain the same and would result in similar significant impacts with respect to maximum daily NO<sub>x</sub> emissions as compared to the proposed Project.

The Reduced Project Alternative would meet the proposed Project's objective that supports consistency with the LAX Master Plan by providing an aircraft maintenance area in the southwest portion of the airport. The Reduced Project Alternative would also meet the objective to provide maintenance facilities and RON/RAD parking areas that are sized to accommodate ADG VI aircraft and other aircraft in one location. However, as only one aircraft hangar would be developed under the Reduced Project Alternative, it would be less able to accommodate the need for maintenance facilities removed by pending projects and therefore would result in the need for use of various other maintenance facilities currently in use at LAX with the potential need for some maintenance to be accommodated at other airports. As such, the Reduced Project Alternative only partially meets the objectives that support the consolidation, relocation, and modernization of the existing aircraft maintenance facilities at LAX. In addition, as only one hangar would be developed under the Reduced Project Alternative, it would only partially support the objective that seeks to provide aircraft maintenance hangars and aircraft parking areas sized to accommodate ADG VI aircraft and other aircraft in one location.

Findings: For reasons discussed above, the BOAC hereby rejects the Reduced Project Alternative. Significant impacts would not be reduced as this alternative would also exceed the regional significance threshold for NO<sub>x</sub> during construction. As only one hangar would be developed under the Reduced Project Alternative, it would only partially support the objective that seeks to provide aircraft maintenance hangars and aircraft parking areas sized to accommodate ADG VI aircraft and other aircraft in one location. The Reduced Project Alternative would also be less able to accommodate the need for maintenance facilities removed by pending projects and would only partially meet the objectives that support the consolidation, relocation, and modernization of the existing aircraft maintenance facilities at LAX.

### **Alternate Site Alternative**

Under this Alternative, the Project site would continue to be used as a staging area for airport construction projects as described under the No Project-No Development Alternative. Proposed maintenance facilities would instead be developed at a location in the eastern portion of the airport, south of Century Boulevard and east of Sepulveda Boulevard within the Delta and United Airlines Complex area. Similar to the proposed Project, the Alternative Site Alternative would be able to accommodate up to 10 ADG VI aircraft, or a mix of smaller aircraft. This Alternative would require removal of the Delta Airlines GSE facility, American Eagle Commuter Terminal, Delta Airlines maintenance area, Mercury Air Group Cargo, LAX Records Retention Building, and the United Maintenance Hangar. Some of the existing hangars and office/administration buildings that would be removed to support development of the Alternative, including the former Western Airlines double-arched hangar, are part of the Intermediate Terminal Complex, which is considered a historical resource pursuant to CEQA.

Existing aircraft maintenance operations would be integrated into the new hangars to the extent possible and some maintenance operations might need to be relocated to other existing maintenance areas. Such consolidation and relocation of maintenance and cargo facilities may overburden the existing facilities and some amount of maintenance and cargo operations may need to be completed at other airports.

Implementation of this Alternative would result in somewhat greater maximum daily emissions given that the intensity of construction activity could increase due to the need for demolition activities and associated equipment usage and vehicle trips. Therefore construction related air quality impacts for the Alternate Site Alternative would be greater than the proposed Project and would also exceed the regional significance threshold for NO<sub>x</sub> during construction.

In addition, as several existing facilities would need to be demolished before construction of the proposed maintenance facilities could begin and as the Alternate Site Alternative is closer to the airport fence line in the downwind direction, construction related health risk impacts would be greater than the proposed Project resulting in potentially significant and unavoidable impacts.

As the Alternate Site Alternative would be able to accommodate up to 10 ADG VI aircraft, or a mix of smaller aircraft it would meet the proposed Project's objectives to provide maintenance facilities and RON/RAD parking areas that are sized to accommodate ADG VI aircraft and other aircraft in one location. However, as the Alternate Site Alternative would be located on the eastern portion of LAX, it would not meet the proposed Project's objective to support consistency with the LAX Master Plan by providing an aircraft maintenance area in the southwest portion of the airport. Furthermore, as certain existing aircraft maintenance and cargo facilities that would need to be demolished under this Alternative could not be accommodated with redevelopment of the site, and would need to be relocated to other areas of LAX or to other airports, this Alternative would only partially meet the Project objectives that support the consolidation, relocation, and modernization of existing aircraft maintenance facilities LAX.

Findings: For reasons discussed above, the BOAC hereby rejects the Alternate Site Alternative. Significant impacts would not be reduced as this alternative would also exceed the regional significance threshold for NO<sub>x</sub> during construction. Furthermore, construction-related health risk impacts associated with the Alternate Site Alternative would be greater, resulting in potentially significant and unavoidable impacts. As the Alternate Site Alternative contains the Intermediate Terminal Complex, a historically significant resource pursuant to CEQA, impacts to cultural and historical resources would be significant and could be significant and unavoidable.

As the Alternate Site Alternative would be located on the eastern portion of LAX, it would not meet the proposed Project's objective to support consistency with the LAX Master Plan by providing an aircraft maintenance area in the southwest portion of the airport. Furthermore, as certain existing aircraft maintenance and cargo facilities that would need to be demolished under this Alternative would need to be relocated to other areas of LAX or to other airports, this Alternative would only partially meet the Project objectives that support the consolidation, relocation, and modernization of existing aircraft maintenance facilities LAX.

**E. Findings on Suggestions Included in Comments on the WAMA Draft EIR**

**a. Comment WAMA-AL00001**

**Operation Control Measures**

Suggestion: To guarantee that its assumptions about WAMA operations and the Draft EIR itself are accurate, the commenter indicated that LAWA should include operation controls as terms of any leases with future tenants. Such operation controls should include the number of engine run-ups the tenant may conduct per month or year (not to exceed a total of 60 run-ups per year by all tenants combined, as indicated by the Draft EIR), and the times of day run-ups may be conducted, observing LAWA's existing run-up curfew from 11:00 p.m. to 6:00 a.m. Terms should also include monthly run-up and other maintenance reports by tenants; a commitment by WAMA tenants to use ground power instead of auxiliary power units, except when APUs are being maintained; a commitment by ADG VI carriers not to exceed 80 percent power during engine run-ups; and a commitment to tow aircraft to and from the WAMA, rather than taxi under aircraft power.

Response: LAWA is willing to require tenants of the WAMA site to abide by the following PDFs:

**WAMA-PDF-1 Quarterly Reporting:** The tenants of the WAMA site will be required to provide to LAWA a quarterly report indicating the number, time of day, duration, and specific aircraft type of all aircraft engine high-power and low-power ground run-ups conducted during the reporting period. This reporting requirement shall also extend to any airline using the WAMA site for ground run-ups as shall be monitored by LAWA Airfield Operations. The completeness and accuracy of the report shall be attested to by a company official of the tenant.

In conjunction with application of a ground run-up reporting program, LAWA will develop a tiered penalty program applicable to violations of the LAX nighttime curfew for aircraft engine high-power ground run-ups. The penalty structure will be modeled after policies seen at other similarly

situated airports (e.g., Seattle Tacoma International Airport). An example of the penalty structure includes: a Letter of Admonishment for first offense within a one year period and fines for second, third and additional offences within a one year period. It is anticipated that LAWA's development of a financial penalty program, to the extent allowed by law, will be tiered, whereby the amount of financial penalty is progressively higher for each recurring violation, with a substantial increase in penalty amounts for repeat violations that occur within a short amount of time.

**WAMA-PDF-2 APU Usage While Aircraft is Parked:** Aircraft parked at the WAMA site shall not utilize on-board auxiliary power units (APUs) for aircraft electrical power or interior cooling at parking spaces where ground power and preconditioned air are available, with the exceptions being: (1) if an APU is being serviced or checked relative to those functions; or (2) for some limited time if APU is required to tug/tow aircraft to/from WAMA site (i.e., for proper operation of essential on-board electronics while being moved). In addition to the proposed RON kits with ground power and preconditioned air for aircraft parking positions along the perimeter of the site (i.e., at hangar areas along World Way West and RON/RAD positions along Pershing Drive), the final WAMA site design will include additional aircraft ground power connect ports at the two interior RON/RAD positions within the site.

**WAMA-PDF-3 Aircraft Taxiing:** All aircraft traveling to or from WAMA during nighttime hours (11:00 p.m. to 6:00 a.m.) must be tugged/towed and are not allowed to taxi under own power, unless otherwise directed by LAWA Airport Operations in situation-specific circumstances where taxiing is required to maintain airfield safety and efficiency.

### Engine Run Ups

Suggestion: The commenter suggests that lease terms with future WAMA tenants should include a mandatory run-up schedule with penalties for violations.

Response: LAWA is willing to require tenants of the WAMA site to abide by the following PDF:

**WAMA-PDF-4 Aircraft Engine Ground Run-Ups:** Aircraft engine high-power ground run-ups of any duration and low-power run-ups of five minutes or more can only occur at the onsite blast fence; and, all run-ups (high-power and low-power of any duration) are prohibited anywhere on the WAMA site between 11:00 p.m. and 6:00 a.m.

Additionally, as described in the previous response above, *WAMA-PDF-1 Quarterly Reporting* sets forth financial penalties for violating the run-up restrictions.

### Remain Overnight/Remain All Day Spaces

Suggestion: The commenter suggests that LAWA must provide an enforceable commitment that RON/RAD spaces will be used only for maintenance.

Response: While LAWA and the WAMA Draft EIR have been clear that the proposed use of the WAMA site includes aircraft maintenance and aircraft parking, LAWA is willing to require tenants of the WAMA site to abide by the following PDF:

**WAMA-PDF-5 Use of the WAMA Site:** Aircraft parking spaces at WAMA site cannot be used for passenger boarding or deplaning (i.e., cannot be used as remote gates), except during or as a result of emergency circumstances.

### Automated Run-Up Noise Monitoring

Suggestion: The commenter suggests that LAWA should include an enforceable mitigation measure requiring monitoring of the Project's low frequency noise impacts by including automated run-up noise monitoring on site and regular public reporting.

Response: There are no significant environmental impacts associated aircraft engine run-ups at the WAMA site that warrant such mitigation. Notwithstanding, LAWA is willing to require the final design of the WAMA development plans include the following PDF:

**WAMA-PDF-6 Automated Run-Up Monitoring System:** An aircraft engine ground run-up monitoring system, including a sound level meter and video camera, will be provided at the run-up area. LAWA will make all reasonable efforts to make data from the monitoring system accessible to the public via an internet link provided on LAWA's website (i.e., lawa.org).

#### **Ground Run-Up Enclosure (GRE)**

Suggestion: The commenter suggests that that LAWA's airport-wide GRE siting study should commence immediately. The study should conclude before the construction of the proposed Project is complete and include serious consideration of the Delta maintenance area and Western Remote Gates as potential GRE sites.

Response: LAWA has developed the scope of work for the LAX GRE Siting Study and retained a consultant team to complete the study. The subject study will include appropriate consideration of a number of potential GRE sites including, but not limited to, the Delta maintenance area and the West Remote Gates area.

#### **Truck Haul Routes**

Suggestion: The commenter suggests that LAWA should include pavement resurfacing on Imperial Highway as a mitigation measure.

Response: The City of Los Angeles' Bureau of Street Services resurfaced the eastbound lanes (southern roadway) of Imperial Highway from Pershing Drive to West Imperial Terminal Driveway in Spring 2012. The current pavement condition of this segment of Imperial Highway is excellent. Per the City's Bureau of Street Services Resurfacing and Reconstruction Division, the resurfacing of the westbound lanes (northern roadway) of Imperial Highway between California Street and Pershing Drive is in the future resurfacing program, pending funding availability and utility clearances. Additionally, it should be noted that, based on the nature of the proposed WAMA project and the proposed construction approach, it is anticipated that heavy truck traffic associated with the Project would be limited and short-term in duration. While the initial stage of Project construction would include truck traffic associated with the export of excess soil from the Project site, that activity will last only a few weeks within the five-year development program. Truck trips associated with construction of the apron area will be reduced by virtue of having an on-site construction concrete batch plant. Upon completion of construction, long-term operation of the WAMA site would involve very few heavy truck trips associated with periodic, infrequent transport of heavy materials such as replacement aircraft engines and other such aircraft components. In light of the above, there is no basis to believe that project implementation would result in substantial notable amounts of heavy truck trips on a frequent/regular basis that would result in damage to Imperial Highway beyond normal wear and tear.

Notwithstanding the above, an incremental amount of damage, if any, could occur and LAWA is willing to include as a PDF of the proposed Project the following:

**WAMA-PDF-7 Resurfacing a Portion of Imperial Highway:** LAWA will work with City of Los Angeles Bureau of Street Services (LABSS) to contribute its reasonable allocable share subject to FAA approval toward resurfacing of Imperial within the City of Los Angeles's jurisdiction; if the LABSS undertakes this resurfacing project, LAWA will also work with LABSS and the Council District 11 office to schedule resurfacing work. LAWA commits to meetings with Caltrans (alongside the City of El Segundo) to discuss improvements to areas under Caltrans control but cannot make any guarantees as to Caltrans' actions.

**Alternative Site**

Suggestion: The commenter suggests that that LAWA evaluate one or more alternatives that sites the new aircraft maintenance facilities somewhere other than near El Segundo's residential community (i.e., away from the southwestern area of LAX). Consideration should be given to locations that are further north and east, away from residential uses (e.g., the West Remote Gate Area).

Response: As evaluated in Chapter 5, Alternatives, of the Draft EIR, four alternatives to the proposed Project were ultimately selected to consider means for avoiding or substantially lessening the significant impacts of the Project. These Alternatives included: 1) a No Project-No Development Alternative; 2) a No Project-Existing LAX Master Plan Alternative; 3) a Reduced Project Alternative and; 4) an Alternate Site Alternative located in the eastern portion of the airport, south of Century Boulevard and east of Sepulveda Boulevard within the Delta and United Airlines Complex area, which is not located near residential development in El Segundo.

As further discussed in Chapter 5, Alternatives, of the Draft EIR, other sites at LAX not located within the southwestern portion of the airport were considered for the Project, and, as suggested by the commenter, a site in the eastern portion of LAX was evaluated and included in the Draft EIR as the "Alternate Site Alternative." As explained in Chapter 5, Alternatives, of the Draft EIR, under Section 5.4, on page 5-3, other alternatives, including the West Remote Pads/Gates, were not carried forward for analysis as they were either not available for development or were located in areas without feasible access and proximity to runways and taxiways.

**b. Comment WAMA- PC00001**

**GRE**

Suggestion: The commenter suggests that LAWA should look at other airports for best practices for GRE's including the consideration of a fully enclosed hush house (Tokyo Narita Airport) into the range of alternatives for GRE's. The commenter would also like ground run-ups and APU's operations to be prohibited at the WAMA.

Response: The airport-wide GRE siting study noted above is expected to include consideration of a number of GRE configurations, including a fully enclosed GRE, such as that mentioned by the commenter. Regarding the commenter's request that ground run-ups and APU operations be prohibited at the WAMA site, the changes in existing ground run-up CNEL values at noise-sensitive receptors with implementation of the proposed Project, without a GRE, are estimated to range from -0.1 decibels (dB) and 0.2 dB, which are well below the threshold of significance of a 1.5 dB increase at or above the 65 dB CNEL. As indicated above, LAWA is willing to include the following PDFs as components of the proposed Project: *WAMA-PDF-2 APU Usage While Aircraft is Parked* and *WAMA-PDF-4 Aircraft Engine Ground Run-Ups*.

**c. Comment WAMA-PC00002**

**GRE**

Suggestion: The commenter suggests that mitigation measures for the WAMA, especially the GRE area be identified and include:

1. A fully enclosed GRE, or "hush house", such as that in use at Tokyo Narita Airport.
2. Ensure operating aircraft engine noise do not face El Segundo, Playa del Rey or Westchester.
3. Ensure use of ground electrical power so that aircraft do not have to use their APU's.
4. Install noise monitoring equipment, and clearly identify and enforce rules and penalties for noise violations in the maintenance area.

## **CEQA Findings – West Aircraft Maintenance Area Project**

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5. Validate a Contamination prevention plan and a response plan for WAMA structures and enforce penalties for contamination.
6. Provide filtering of all runoff and wastewater.

Response: As indicated above, LAWA is willing to include design features *WAMA-PDF-2 APU Usage While Aircraft is Parked*, *WAMA-PDF-4 Aircraft Engine Ground Run-Ups*, and *WAMA-PDF-6 Automated Run-Up Monitoring System* as components of the proposed Project. Regarding additional suggestions, the proposed Project does not include a GRE. It is also not possible to ensure that operating aircraft engine noise does not face those, or any other, particular areas given that aircraft taxiing to and from the Project site, or for that matter, taxiing anywhere at the airport, must be able to travel/turn in positions anywhere within 360 degrees.

Activities at the LAX that involve hazardous materials/wastes are subject to numerous federal, state, and local requirements pertaining to safety, contamination prevention, and emergency response. In addition, as detailed in Section 4.3, *Hazards and Hazardous Materials*, and Section 4.4, *Hydrology and Water Quality*, of the Draft EIR, the proposed Project includes LAX Master Plan Commitments and Mitigation Measures pertaining to hazards and hazardous materials, as well as BMPs associated with hydrology and water quality that would ensure that impacts would be less than significant.

### **F. Findings on Responses to Comments on the Draft EIR and Revisions to the Final EIR**

Responses to comments made on the Draft EIR and revisions made in the Final EIR merely clarify and amplify the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines Section 15088.5(b).

### **G. Location and Custodian of Records**

The documents and other materials that constitute the administrative record for LAWA's actions related to the Project are located at LAWA, One World Way, 2nd floor, Los Angeles, CA 90045. The LAWA Capital Programming and Planning Division is the custodian of the administrative record for the Project.