California Environmental Quality Act Findings
LAX Landside Access Modernization Program

1. Project Description Summary

The Los Angeles International Airport (LAX) Landside Access Modernization Program (Project) seeks to improve access options and the travel experience for passengers; shift the location where different modes of traffic operate within the Central Terminal Area (CTA) and on the surrounding street network; and provide a direct connection via the proposed Automated People Mover (APM) to the Los Angeles County Metropolitan Transportation Authority (Metro) Crenshaw/LAX Line and Green Line and Metro transit system. By implementing this Project, Los Angeles World Airports (LAWA) seeks to provide more travel time certainty, reduce traffic congestion and improve air quality in and around Los Angeles International Airport (LAX or Airport).

The proposed Project includes the following components:

- An Automated People Mover (APM) system with six APM stations connecting the CTA via an above-grade fixed guideway to new proposed ground transportation facilities;
  - Passenger walkway systems with moving walkways connecting the APM stations to passenger terminals, parking garages, and ground transportation facilities;
  - Modifications to existing passenger terminals and parking garages to support the APM walkway system connections, including vertical circulation (elevators, escalators, and stairs) cores to garage levels and to the arrival, departure, and concourse levels at the terminals;
  - An APM maintenance and storage facility (MSF);
  - APM power substations;
- A consolidated rental car facility (CONRAC) designed to meet the needs of rental car agencies serving LAX with access to the CTA via the APM;
- Two intermodal transportation facilities (ITFs) providing airport parking and pick-up and drop-off areas outside the CTA for private vehicles and commercial shuttles;

- Roadway improvements designed to improve access to the proposed facilities and the CTA and reduce traffic congestion in neighboring communities;
- Security features, including security fencing, surveillance cameras, security lighting, and emergency phones/call boxes, to meet the security needs of the Los Angeles World Airports Police Department (LAWAPD);
- Fire safety features in compliance with fire and building code requirements including fire hydrants, fire sprinklers, and fire extinguishers;
- Utilities infrastructure, both new and modified to support the proposed Project;
- Identify options for pricing, policies and procedures in regards to vehicle operations at LAX;
- Incorporation of the LAX Design Guidelines into the proposed Project;
- Land acquisition, subdivision of parcels, creation of new tract maps, and/or other reconfiguration of parcels, dedications and vacations of public rights-of-way, as well as zoning change approvals;
- Future potential related development on land owned by LAWA located adjacent to the new proposed ground transportation facilities;
- Enabling projects to allow construction of the proposed Project, including utility relocation and demolition of certain existing facilities, some of which would be reconstructed; and
- Amendments to plans regulating land use in the area, including the City of Los Angeles General Plan, LAX Plan, and the LAX Specific Plan, zone changes, and the reconfiguration of existing parcels.

2. Project Objectives

The underlying purposes of the proposed Project are to improve access to LAX and relieve congestion at the Airport and on surrounding roadways. The Project objectives for the LAX Landside Access Modernization Program that support the underlying purposes are:

(a) Enhance the passenger experience by providing new access options for all modes of travel, including direct connections to transit, convenient parking, and commercial vehicles;

(b) Provide easier and more efficient access to rental cars and non-CTA parking facilities;

(c) Relieve congestion at LAX and on the surrounding street system by developing a flexible transportation system that provides alternatives to the CTA for passengers, airport and other employees, and airport-related vendors accessing LAX;

(d) Promote the sustainability of LAX by improving the efficiency and operation of the surface transportation system in which LAX operates;

(e) Enhance and integrate the overall design of LAX Landside Access Modernization Program facilities with existing CTA structures and new airport facilities both inside and outside the CTA;

(f) Maintain airport operations during construction; and

(g) Ensure the highest and best use for reuse of any potential future surplus property in compliance with FAA grant obligations.

These objectives are consistent with the following general goals LAWA has established for LAX as part of its sustainability program and policies that strive to minimize the impact of LAX operations on the surrounding communities:

- Build new efficient transportation facilities that conserve energy, water, and other resources.
- Reduce traffic congestion and vehicle miles traveled, thereby improving air quality.
- Reduce air emissions from transportation sources to comply with Senate Bill (SB) 375.
- Design and construct the new transportation facilities in a manner that minimizes disruptions to airport operations.

- Design and construct the new transportation facilities in a manner that integrates with existing and new airport facilities.
- Utilize airport property located near the new transportation facilities for construction staging, construction activities, and/or temporary relocation areas to build the APM, CONRAC, ITFs, roadway improvements, and other Project elements. Upon completion of the new transportation facilities, consider new uses complementary to LAX and the surrounding uses that meet the needs of passengers, visitors, employees, and guests of hotels in the area.
- Generate additional employment opportunities and economic activity that benefit the communities located around LAX and the City of Los Angeles.

3. Procedural History

Los Angeles World Airports (LAWA) has prepared an environmental impact report (EIR) for the 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 February 5, 2015 through March 9, 2015. Two scoping meetings were held on February 19, 2015 and February 21, 2015. On September 15, 2016, the City of Los Angeles published the Draft EIR for the proposed Project. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period scheduled to close on October 31, 2016. During the public review period, LAWA received requests for an extension of the comment period. LAWA extended the comment period by an additional 15 days, with the review period closing on November 15, 2016. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were provided the opportunity to comment through October 31, 2016. Two public workshops were held during the comment period: one on October 15, 2016 and one on October 19, 2016. The City of Los Angeles published the Final EIR for the proposed Project on February 17, 2017.

The Final EIR incorporates and responds to comments received on the Draft EIR, and includes corrections and additions to the Draft EIR. Chapter 3 of the Final EIR includes final revisions to the text of several mitigation measures that are described in these Findings. Project-specific Mitigation Measures, as well as mitigation measures that are LAWA Standard Control Measures, have been included in a Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project. LAWA, the Los Angeles Board of Airport Commissioners (BOAC), and other decision-makers will use the Final EIR to inform their decisions on the proposed Project.

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

4. Environmental Impacts and Findings

Pursuant to Public Resources Code §21081 and State 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 avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- Such 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 provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the final EIR.

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 Mitigation Monitoring and Reporting Program (State CEQA Guidelines §15097(a)) for the proposed Project.

4.1 Findings on No Significant Impacts Identified in the Initial Study

4.1.1 DESCRIPTION OF EFFECTS

The Initial Study prepared for the proposed Project in February 2015, included as Appendix A of the Draft EIR, evaluated potential impacts on a range of subjects listed in Appendix G of the State CEQA Guidelines. The analysis conducted for the Initial Study determined that the proposed Project would have no impacts on the following resource areas: Agricultural and Forestry Resources, and Mineral Resources; and less than significant impacts on the following resources areas: Geology and Soils, and Recreation.

4.1.2 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 no significant construction- or operation-related impacts for the proposed Project or potential future related development would occur to Agricultural and Forestry Resources, Geology and Soils, Mineral Resources, and Recreation. The Initial Study requires no further action or mitigation measures with respect to these resources or the findings of the Initial Study. The BOAC hereby adopts the conclusions regarding no significant construction- and operation-related impacts on these environmental subject areas.

4.2 Findings on Less than Significant Impacts

4.2.1 DESCRIPTION OF EFFECTS

Based on the issue area assessment in the EIR, the BOAC has determined that the proposed Project (as described above and with implementation of applicable standard control and mitigation measures identified in the Final EIR) will have less than significant impacts in several categories as summarized in **Table 1** below, which excludes impacts of potential future related development. **Table 2** presents a summary of less than significant impacts for the potential future related development component of the proposed Project. For each of the impacts set forth below, the BOAC adopts and incorporates by reference the discussion of each of the impacts in the detailed issue area analyses in Chapter 4 of the Draft EIR and Chapter 3, *Corrections and Additions to the Draft EIR*, of Volume 11 of the Final EIR as the rationale for the conclusion that there would be no impact or less than significant impacts.

4.2.2 FINDINGS

Based on substantial evidence in the administrative record, including Chapter 4 of the Draft EIR and Chapter 3 of the Final EIR, the BOAC hereby finds and determines that impacts associated with the proposed Project (excluding potential future related development) as listed in Table 1 would be less than significant with respect to Aesthetics (except for visual character), certain Air Quality impacts , Human Health Risk (operations), Biological Resources (operations), Cultural Resources (human remains), Greenhouse Gas Emissions (no net increase), Hazards and Hazardous Materials (except for interfering with ongoing remediation and emergency response or evacuation plan), Water Quality and Groundwater, Land Use and Planning, Noise (except for construction traffic and equipment noise and vibration), Population and Housing, On-Airport Traffic, and Utilities and Service Systems and Energy. The BOAC hereby adopts the conclusions regarding less-than-significant impacts on these environmental subject areas.

Table 1: Less than Significant Impacts of the Proposed Project

RESOURCE CATEGORY	PROPOSED PROJECT
Aesthetics	
Shading	Less than Significant
Light and Glare	Less than Significant
Air Quality	
Construction – Regional emissions of CO, SO_2, PM_{10} and $PM_{2.5}$	Less than Significant
Construction – Local concentrations of CO, SO_2 and $PM_{2.5}$	Less than Significant
Operations – Regional emissions of VOC, CO, NO_X, SO_2, PM_{10} and $PM_{2.5}$	Less than Significant
Operations – Local concentrations of VOC, CO, NO_X, SO_2, and $PM_{2.5}$	Less than Significant
Human Health Risk	
Operations	Less than Significant
Biological Resources	
Operations	Less than Significant
Cultural Resources	
Human Remains	Less than Significant
Greenhouse Gas Emissions	
No Net Increase (quantifiable)	Less than Significant
Hazards and Hazardous Materials	
Unauthorized and Uncontrolled Release	Less than Significant
Exposure of Workers	Less than Significant
Hazardous Emissions and Materials within ¼-mile of School	Less than Significant
Hydrology and Water Quality	
Water Quality	Less than Significant
Groundwater	Less than Significant
Land Use and Planning	Less than Significant
Noise	
Road Traffic Noise	Less than Significant
Transit Noise and Vibration	Less than Significant
Population and Housing	Less than Significant
Transportation/ Traffic	
On-Airport Traffic	Less than Significant
Energy	Less than Significant
Water	Less than Significant

SOURCE: Ricondo & Associates, Inc., February 2017.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

Table 2: Less than Significant Impacts of the Potential Future Related Development

RESOURCE CATEGORY	PROPOSED PROGRAM
Aesthetics	
Visual Character	Less than Significant
Shading	Less than Significant
Light and Glare	Less than Significant
Air Quality	
Construction – Regional emissions of CO, VOC, SO_2, PM_{10} and $PM_{2.5}$	Less than Significant
Construction – Local concentrations of CO, NO_2, SO_2 and $PM_{2.5}$	Less than Significant
Operations – Regional emissions of CO, SO_2, PM_{10} and $PM_{2.5}$	Less than Significant
Human Health Risk	
Operations	Less than Significant
Biological Resources	
Construction	Less than Significant
Operations	Less than Significant
Cultural Resources	
Historic Resources	Less than Significant
Human Remains	Less than Significant
Unauthorized and Uncontrolled Release	Less than Significant
Exposure of Workers	Less than Significant
Hazardous Emissions and Materials within ¼-mile of School	Less than Significant
Hydrology and Water Quality	
Water Quality	Less than Significant
Groundwater	Less than Significant
Land Use and Planning	Less than Significant
Noise	
Road Traffic Noise	Less than Significant
Transit Noise and Vibration	Less than Significant
Population and Housing	Less than Significant
Public Services	
Fire Protection	Less than Significant
Law Enforcement	Less than Significant
Schools	Less than Significant
Transportation/ Traffic	
On-Airport Traffic	Less than Significant
Energy	Less than Significant
Water	Less than Significant

SOURCE: Ricondo & Associates, Inc., February 2017.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

The BOAC also hereby finds and determines that impacts associated with the potential future related development as listed in Table 2 would be less than significant with respect to Aesthetics, certain Air Quality impacts , Human Health Risk (operations), Biological Resources, Cultural Resources (historic resources and

human remains), Hazards and Hazardous Materials (except for interfering with ongoing remediation and emergency response or evacuation plan), Water Quality and Groundwater, Land Use and Planning, Noise (except for construction traffic and equipment noise and vibration), Population and Housing, Public Services, On-Airport Traffic, and Utilities and Service Systems and Energy. The BOAC hereby adopts the conclusions regarding less-than-significant impacts on these environmental subject areas.

4.3 Findings on Impacts that Will Be Reduced to Below the Level of Significance with Mitigation

4.3.1 AIR QUALITY AND HUMAN HEALTH RISK

4.3.1.1 Impacts

The South Coast Air Quality Management District (SCAQMD) has developed construction-related thresholds of significance for criteria pollutant concentration impacts from projects proposed in the South Coast Air Basin. These thresholds are summarized in Table 4.2.1-6 within Section 4.2.1, *Air Quality*, of the Draft EIR. Significance determinations for health impacts are assessed as incremental increases or decreases in cancer risks and non-cancer health hazards, based on SCAQMD and CalOSHA guidance. A significant incremental impact to human health would occur if the proposed Project would result in one or more of the following conditions:

- An increased incremental cancer risk greater than, or equal to, 10 in one million (10×10^{-6}) for potentially exposed off-site workers, residents, or school children.
- A cancer burden greater than, or equal to 0.5 excess cancer cases in areas within the greater than 1 in 1 million zone of impact.
- A total incremental chronic hazard index greater than, or equal to, one for any target organ system at any receptor location.
- A total incremental acute HI greater than, or equal to, one for any target organ system at any receptor location.
- Exceedance of Permissible Exposure Limits - Time Weighted Average or Threshold Limit Values for workers.

4.3.1.2 Description of Effects

As shown in Table 4.2.1-8, within Section 4.2.1, *Air Quality*, of the Draft EIR, emissions from Project-related construction activities would result in exceedances of the localized concentration-based thresholds for NO_2 and PM_{10}. Impacts would be significant. However, with incorporation of standard control measure LAX-AQ-1, Construction-Related Air Quality Control Measures, and mitigation measure MM-AQ (LAMP)-1, Preferential Use of Renewable Diesel Fuel, peak concentrations of NO_2 and PM_{10} (24-hour) would be reduced to less than significant, as shown in revised Table 4.2.1-27 within Chapter3 of the Final EIR. Impacts to human health are

discussed in Section 4.2.2, *Human Health Risk Assessment*, of the Draft EIR. As shown in Table 4.2.2-2, incremental peak construction-related cancer risks would be significant for adult and child residents, and school children. With incorporation of standard control measure LAX-AQ-1 and mitigation measure MM-AQ (LAMP)-1, incremental peak construction-related cancer risks for adult and child residents, and school children would be reduced to less than significant, as shown in revised Table 4.2.2-12 within Chapter 3 of the Final EIR. Impacts would be less than significant.

4.3.1.3 Findings

Based on substantial evidence in the administrative record, including Section 4.2.1, *Air Quality*, and Section 4.2.2, *Human Health Risk Assessment*, of the Draft EIR, and Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with implementation of standard control measure LAX-AQ-1 and Mitigation Measure MM-AQ (LAMP)-1, significant construction impacts to peak concentrations of NO_2 and PM_{10} (24-hour) would be reduced to a level that is less than significant. Additionally, with implementation of standard control measure LAX-AQ-1 and mitigation measure MM-AQ (LAMP)-1, incremental peak construction-related cancer risks for adult and child residents, and school children would be reduced to less than significant. Provisions of utilizing cleaner engines and renewable diesel fuel reduce the emissions associated with construction below the significance thresholds for NO_2 and PM_{10} (24-hour), and associated cancer risks. Beyond this standard control measure and mitigation measure, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other air quality mitigation measures would be required for these impacts as they will be less than significant.

4.3.2 BIOLOGICAL RESOURCES

4.3.2.1 Impact

Significant impacts to biological resources would occur if the proposed Project would:

- Substantially interfere with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance.

4.3.2.2 Description of Effects

As discussed in Section 4.3, *Biological Resources*, of the Draft EIR, the Project site does not include native habitat areas that are used for movement by migratory fish or wildlife species, nor that are part of a wildlife corridor between large open space areas or that contain wildlife nursery sites. However, various roadways within or adjacent to the Project site are lined with mature trees that could harbor raptor and other native birds and their nests. During construction of the proposed Project, approximately 900 trees would be removed from the area, resulting in a potentially significant impact related to nesting birds/raptors. However,

through implementation of Standard Control Measures LAX-BR-1, Conservation of Faunal Resources: Nesting Birds/Raptors, and LAX-BR-2, Conservation of Floral Resources: Mature Tree Replacement – Nesting Birds, as well as LAX-A-1, Lighting Controls, impacts would be reduced to less than significant.

4.3.2.3 Findings

Based on substantial evidence in the administrative record, including Section 4.3, *Biological Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with implementation of standard control measures, LAX-A-1, LAX-BR-1, and LAX-BR-2, significant impacts to nesting birds/raptors would be reduced to a level that is less than significant, and less than cumulatively considerable, because these measures would prevent substantial interference with the movement of resident or migratory wildlife species through protecting nesting birds/raptors and providing replacement habitat. Beyond these standard control measures, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other biological resource mitigation measures would be required for these impacts as they will be less than significant.

4.3.3 CULTURAL RESOURCES

4.3.3.1 Impacts

A significant impact on historical and archaeological resources would occur if the proposed Project would result in:

- A substantial adverse change in the significance of a "historical resource" as defined by State CEQA Guidelines Section 15064.5(a). Substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the National Register, California Register, and/or local register.
- Causing a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5.
- Direct or indirect destruction of a unique paleontological resource or site or unique geologic feature.
- Disturbance of any human remains, including those interred outside of formal or dedicated cemeteries.

4.3.3.2 Description of Effects

4.3.3.2.1 Historical Resources

As discussed in Section 4.4, *Cultural Resources*, of the Draft EIR, the records search for historical resources involved review of previous surveys records and reports on file. These surveys identified seven properties as either designated or potentially eligible for federal, state, and/or local designation, as well as one property that was identified but determined ineligible within the areas of investigation (see Appendix H of the Draft EIR). One eligible historic resource, the Theme Building, would be significantly impacted by the proposed Project, as discussed in Section 4.4.3 of these CEQA Findings. A second historic resource, the 1961 Airport Traffic Control Tower (ATCT) would be potentially affected by the proposed Project. The 1961 ATCT has been substantially altered but is still recognizable as a control tower and retains sufficient integrity to be eligible for local listing as a Los Angeles Historic-Cultural Monument (LAHCM). The elevated APM guideway would enter the CTA from the east just south of the 1961 ATCT, but would not require demolition of the 1961 ATCT. The Phase 2 roadways could require the demolition of the adjacent Clifton Moore Administration Building. Demolition of the Administration Building and construction of the APM guideway has the potential to impact the 1961 ATCT and damage or destroy its original character-defining features, if the 1961 ATCT is not protected during construction due to its close proximity to the proposed APM guideway and Administration Building. If the 1961 ATCT is not protected during construction, it would result in a significant impact because the proposed Project would cause a substantial adverse change in the significance of a "historical resource". Implementation of Mitigation Measure MM-HR (LAMP)-2, Protection of 1961 Airport Traffic Control Tower, would protect the 1961 ATCT during demolition of the adjacent Administration Building and during construction of the APM guideway. Thus, potentially significant impacts related to the 1961 ATCT as a result of demolition of the Administration Building and construction of the APM guideway would be less than significant.

4.3.3.2.2 Archaeological Resources

As discussed in Section 4.4, *Cultural Resources*, of the Draft EIR, the cultural resource records search and recent surveys indicated that no previously recorded archaeological resources (including historic or prehistoric archaeological resources) are located within the Project area; however, 11 archaeological resources have been recorded within a half-mile radius. None of these resources would be impacted by the proposed Project. Much of the Project area is developed with surface parking lots, buildings, streets, and/or dense vegetation (i.e., sod, landscaping) which obstructed the surveyor's view of the native ground surface. While discovery of archaeological resources in artificial fill deposits within the Project area is unlikely, proposed excavations that would occur below the fill levels could impact intact archaeological resources that have not been disturbed or displaced by previous development. Since the proposed Project would include excavations of varying depths across portions of the Project area, including excavations at depths where native soils would be encountered, the proposed Project could impact previously unknown buried archaeological resources that fall within the definition of historic resources or unique archeological resources. Thus, impacts to archaeological resources from the proposed Project, including potential future related development, could be significant. However, with implementation of standard control measures, LAX-AR-1, Conformance with LAWA's Archaeological

Treatment Plan, and LAX-AR-2, Archaeological Resources Construction Personnel Briefing, significant impacts to archaeological resources that are historical resources or unique archeological resources would be reduced to a level that is less than significant and the proposed Project's contribution to potentially significant cumulative impacts on archaeological resources would not be cumulatively considerable. These mitigation measures would ensure that construction contractors are aware of LAWA's Archaeological Treatment Plan and the procedures that need to be followed in the event of an unanticipated discovery.

4.3.3.2.3 Paleontological Resources

As discussed in Section 4.4, *Cultural Resources*, of the Draft EIR, the paleontological resources records search indicated that no previously recorded vertebrate fossil localities are located within the Project area. As mentioned previously, the Project area is located within a highly urbanized area and has been subject to disturbance by Airport operations and development, commercial and residential development, and other on-going construction activities that have likely displaced surficial paleontological resources. A pedestrian survey conducted in 2015 for the proposed Project did not identify any new paleontological resources or unique geologic features. While discovery of paleontological resources in artificial fill deposits within the Project area is unlikely, proposed excavations that would occur below the fill levels could impact intact paleontological resources that have not been disturbed or displaced by previous development. Since the proposed Project would include excavations of varying depths across portions of the Project area, including excavations at depths where native soils would be encountered, the proposed Project could impact previously unknown buried unique paleontological resources. Thus, impacts to paleontological resources from the proposed Project, including potential future related development, could be significant. With implementation of standard control measures, LAX-PR-1, Conformance with LAWA's Paleontological Management Treatment Plan (PMTP), and LAX-PR-2, Paleontological Resources Construction Personnel Briefing, potentially significant impacts to paleontological resources would be reduced to a level that is less than significant and the proposed Project's contribution to potentially significant cumulative impacts on paleontological resources would not be cumulatively considerable. These mitigation measures would ensure that construction contractors are aware of LAWA's Paleontological Management Treatment Plan and the procedures that need to be followed in the event of an unanticipated discovery.

4.3.3.3 Findings

Based on substantial evidence in the administrative record, including Section 4.4, *Cultural Resources*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with incorporation of the standard control measures identified above, LAX-AR-1, LAX-AR-2, LAX-PR-1, and LAX-PR-2, the proposed Project, including potential future related development, will not have significant impacts to paleontological or archaeological resources. These mitigation measures would ensure that construction contractors are aware of LAWA's Archaeological Treatment Plan and Paleontological Management Treatment Plan and the procedures that need to be followed in the event of an unanticipated discovery. Additionally, the proposed Project would not have a significant impact on the 1961 ATCT with incorporation of Mitigation Measure MM-HR (LAMP)-2, which would ensure that contractors put in place procedures to protect the 1961 ATCT during construction activities

occurring in the vicinity of the 1961 ATCT. Beyond these standard control measures and Project-specific mitigation measure, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other cultural resource mitigation measures would be required for these potential impacts as they will be less than significant.

Additionally, with the mitigation described above, the Project's contribution to cumulative impacts to cultural resources will be less than cumulatively considerable.

4.3.4 HAZARDS AND HAZARDOUS MATERIALS

4.3.4.1 Impacts

A significant hazardous materials impact would occur if the proposed Project would result in the contamination of soil or groundwater due to a spill or release, or prevention of cleanup of sites that are currently undergoing soil or groundwater remediation. The proposed Project would have a significant impact related to safety hazards if it would result in the impairment of the effective implementation of an adopted emergency response or emergency evacuation plan.

4.3.4.2 Description of Effects

4.3.4.2.1 Hazardous Materials

As discussed in Section 4.6, *Hazards and Hazardous Materials*, of the Draft EIR, improvements associated with the proposed Project, including potential future related development, may interfere with ongoing remediation at the Allied-Signal/Park One/Honeywell site, the Budget Rent-A-Car site, and the National Car Rental and Car Sales sites, if the remediation is still in operation at the time the proposed Project is constructed. Several other sites of concern have the regulatory status of "open—site assessment" and may require remediation in the future. If construction of the proposed Project or potential future related development were to interfere with existing or planned remediation activities at any of these sites, LAWA would coordinate with the responsible parties to identify potential alternative sites for locating groundwater monitoring wells, injection wells, or other similar facilities required to implement remediation. If no alternative sites are suitable to conduct the required remediation activities, LAWA would need to either find a way to expedite the remediation activities or work with the relevant regulatory agencies to determine options for allowing construction while achieving the objectives of the required remediation. Because the proposed Project has the potential to interfere with the cleanup of sites undergoing remediation, the impact would be significant. However, with implementation of standard control measures, LAX-HM-1, Ensure Continued Implementation of Existing Remediation Efforts Affected by Onsite Construction, and LAX-HM-2, Ensure Continued Implementation of Existing Remediation Efforts on Parcels Subject to Acquisition significant impacts associated with prevention of cleanup of sites that are currently undergoing soil or groundwater remediation would be reduced to a level that is less than significant.

4.3.4.2.2 Safety Hazards

As discussed in Section 4.6, *Hazards and Hazardous Materials*, of the Draft EIR, the proposed Project would introduce new uses and activities and would alter ground access across the Project site. Traffic congestion associated with construction activities could impede the movement of emergency vehicles. While temporary, this increased traffic congestion could potentially delay emergency access throughout the Project site. The impacts associated with the impairment of the implementation of an adopted emergency response or emergency evacuation plan would be significant. However, with implementation of Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Project Task Force; MM-ST (LAMP)-2, Maintenance of Traffic; MM-ST (LAMP)-3, Worksite Traffic Control Plans; MM-ST (LAMP)-4, Roadway Closure Restrictions; and MM-ST (LAMP)-5, Traffic Maintenance During Construction, significant impacts of the proposed Project related to the impairment of the effective implementation of an adopted emergency response plan would be reduced to a level that is less than significant. Implementation of these mitigation measures would reduce the impact to implementation of an adopted emergency response plan through the establishment of a Project Task Force, Worksite Traffic Control Plans, roadway closure restrictions, and other measures to ensure emergency access is maintained during construction. As such, the proposed Project's contribution to significant cumulative impacts to implementation of an adopted emergency response or emergency evacuation plan would not be cumulatively considerable.

4.3.4.3 Findings

Based on substantial evidence in the administrative record, including Section 4.6, *Hazards and Hazardous Materials*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with incorporation of standard control measures LAX-HM-1 and LAX-HM-2, and mitigation measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4 and MM-ST (LAMP)-5, the proposed Project, including potential future related development, will not have significant impacts to hazards or hazardous materials. These measures would ensure that any existing or ongoing remediation occurs to achieve the objectives of the required remediation and ensure that emergency access and response is not impeded in the area due to construction activities associated with the proposed Project. Beyond these standard control measures and Project-specific mitigation measures, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other hazards and hazardous materials mitigation measures would be required for these impacts as they will be less than significant.

4.3.5 HYDROLOGY, WATER QUALITY, AND GROUNDWATER

4.3.5.1 Impacts

A significant hydrology impact would occur if the proposed Project would result in one or more of the following:

- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.
- An increase in runoff that would cause or exacerbate flooding with the potential to harm people or damage property.
- Substantial alteration of the existing drainage pattern of the site in a manner which would result in substantial erosion or siltation on- or off-site.

4.3.5.2 Description of Effects

As discussed in Section 4.7, *Hydrology, Water Quality and Groundwater*, of the Draft EIR, development of land for the proposed Project, including potential future related development, could create or contribute runoff water that could exceed the capacity of existing or planned stormwater drainage systems. Additionally, development of land for the proposed Project or potential future related development could create or contribute runoff water that could cause or exacerbate flooding. However, with implementation of Project-specific mitigation measures MM-HWA (LAMP)-1, Stormwater Management Facilities (Project-Specific), and MM-HWA (LAMP)-2, Stormwater Management Facilities (Project-Specific), the proposed Project's significant impacts on stormwater drainage systems and flooding would be reduced to a level that is less than significant and the proposed Project's contribution to significant cumulative impacts on stormwater drainage systems and flooding would not be cumulatively considerable. Similarly, with implementation of Mitigation Measure MM-HWA (LAMP)-3, Stormwater Management Facilities (Programmatic), impacts resulting from potential future related development on stormwater drainage and flooding would be reduced to a level that is less than significant. The mitigation measures would assure that the proposed Project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, and would not cause an increase in runoff that would cause or exacerbate flooding with the potential to harm people or damage property.

4.3.5.3 Findings

Based on substantial evidence in the administrative record, including Section 4.7, *Hydrology, Water Quality, and Groundwater*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with incorporation of Mitigation Measures MM-HWA (LAMP)-1, MM-HWA (LAMP)-2, and MM-HWA (LAMP)-3, the proposed Project, including potential future related development will not have significant impacts to hydrology. These mitigation measures would ensure that stormwater runoff from the new facilities is managed and controlled in compliance with City and local regulations. Beyond these Project-specific mitigation measures, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other hydrology mitigation measures would be required for these potential impacts as they will be less than significant.

Additionally, with the mitigation described above, the Project's contribution to cumulative impacts on stormwater drainage systems and flooding will be less than cumulatively considerable.

4.3.6 NOISE – CONSTRUCTION EQUIPMENT NOISE

4.3.6.1 Impacts

A significant construction equipment noise impact would occur if the Project would result in one or more of the following conditions:

- Construction activities lasting more than 1 day would exceed existing ambient exterior noise levels by 10 dB(A) or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a 3-month period would exceed existing ambient exterior noise levels by 5 dB(A) or more at a noise-sensitive use; or
- Construction activities would exceed the ambient exterior noise level by 5 dB(A) at a noise-sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday; before 8:00 a.m. or after 6:00 p.m. on Saturday; or at any time on Sunday.

4.3.6.2 Description of Effects

As discussed in Section 4.9, *Noise*, of the Draft EIR, construction of the proposed Project, including potential future related development would occur in areas adjacent to several noise-sensitive receptors, including hotel and residential areas. The distance between noise-sensitive receptors and construction activities would result in an increase over the existing ambient noise level, resulting in significant construction equipment noise impacts. However, with implementation of standard control measure, LAX-N-1, Construction-Related Noise Control, and mitigation measure MM-N (LAMP)-1, Noise Curtains or other noise mitigation measures, significant Project-related construction equipment noise impacts would be reduced to a level that would be less than significant, and the Project's incremental contribution to significant construction equipment noise impacts would be less than cumulatively considerable.

4.3.6.3 Findings

Based on substantial evidence in the administrative record, including Section 4.9, *Noise*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with incorporation of standard control measure LAX-N-1 and mitigation measure MM-N (LAMP)-1, the proposed Project, including potential future related development, will not have significant impacts to construction equipment noise. Beyond the standard control measure and Project-specific mitigation measure, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other construction equipment noise mitigation measures would be required for these impacts as they will be less than significant.

Additionally, with the mitigation described above, the Project's contribution to significant construction equipment noise impacts would be less than cumulatively considerable.

4.3.7 PUBLIC SERVICES

4.3.7.1 Impacts

A significant impact on fire protection and emergency services would occur if the proposed Project would result in restricted emergency access, increased response times, extended station response distances, or decreased fire flow beyond the standards maintained by the agencies serving LAX and the surrounding communities.

A significant impact on law enforcement services would occur if the proposed Project would result in an increase in emergency response times beyond the limits required by applicable jurisdictions within the study area, caused by increased traffic congestion, changes in circulation, expansion of airport property, or the location of new land uses.

4.3.7.2 Description of Effects

4.3.7.2.1 Fire Protection

As discussed in Section 4.11.1, *Fire Protection*, of the Draft EIR, construction of the proposed Project would alter ground access throughout the Project site. Traffic congestion associated with construction of the proposed Project could delay the Los Angeles Fire Department (LAFD)'s emergency response activities by impeding the movement of emergency vehicles. Construction of the proposed roadway improvements would contribute to increases in traffic congestion at various locations within the Project site until the year 2024, when the majority of the roadway improvements would be completed. The LAFD's average response times in and around the Project site may increase as a result of the response distance and traffic conditions. Traffic congestion would improve after 2024; however, the remaining roadway improvements would not be completed until 2035. Therefore, the phased implementation of these roadway improvements by 2024 and 2035 could delay emergency access within the Project site, which would be a significant impact. LAWA would coordinate with the LAFD regarding emergency access and other design needs to ensure that fire protection service levels are maintained during construction. However, construction of the proposed Project could delay the LAFD's emergency response activities by restricting emergency access and increasing response times, resulting in significant impacts. However, with implementation of Mitigation Measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4, and MM-ST (LAMP)-5, the proposed Project's significant impacts on fire protection and emergency services would be reduced to a level that is less than significant, and less than cumulatively considerable, because these measures would facilitate effective coordination with LAFD to meet its standards and requirements, and through Project Task Force implementation would ensure the availability of emergency access and adequate response times during all construction phases.

4.3.7.2.2 Law Enforcement

As discussed above and in Section 4.11.2, *Law Enforcement*, of the Draft EIR, construction of the proposed Project would alter ground access throughout the Project site. Traffic congestion associated with construction

of the proposed Project could delay the ability for LAWAPD to provide adequate emergency response. LAWAPD's average response times in and around the Project site may increase as a result of the response distance and traffic conditions. Additionally, roadway closures would have the potential to result in increased response times for law enforcement. LAWA would coordinate with LAWAPD regarding emergency access and other design needs to ensure that there is adequate emergency access throughout the Project site during construction. Phased implementation of roadway improvements by 2024 and 2035 would have the potential to increase emergency response times throughout the Project site and therefore result in a significant impact. However, with implementation of Mitigation Measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4, and MM-ST (LAMP)-5, the proposed Project's significant impacts on law enforcement services would be reduced to a level that is less than significant, and less than cumulatively considerable, because these measures would facilitate effective coordination with LAWAPD and LAPD to meet their standards and requirements, and through Project Task Force implementation would ensure the availability of emergency access and adequate response times during all construction phases.

4.3.7.3 Findings

Based on substantial evidence in the administrative record, including Section 4.11, *Public Services*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with incorporation of Mitigation Measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4, and MM-ST (LAMP)-5, the proposed Project will not have significant impacts to fire protection or law enforcement services. These mitigation measures will ensure that emergency access and response is not impeded in the area due to construction activities associated with the proposed Project. Beyond the Project-specific mitigation measures, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other mitigation measures would be required for these impacts as they will be less than significant.

Additionally, with the mitigation described above, the Project's contribution to significant impacts on fire protection and law enforcement services would be less than cumulatively considerable.

4.3.8 CONSTRUCTION SURFACE TRAFFIC – INTERSECTIONS

4.3.8.1 Impacts

The construction traffic study area intersections either fall entirely within the City of Los Angeles or share a boundary with the City of El Segundo or the City of Inglewood. The intersections which fall entirely within the City of Los Angeles were evaluated for traffic impacts using the LADOT traffic impact significance criteria. Intersections lying on the boundary of multiple jurisdictions were evaluated using the more conservative threshold of significance criteria; in all of these cases the LADOT criteria were shown to have the most conservative thresholds. Specific intersection criteria are discussed in Section 4.12.3.6 of the Draft EIR.

4.3.8.2 Description of Effects

As discussed in Section 4.12.3, *Construction Surface Transportation*, of the Draft EIR, the traffic analysis conducted determined impacts for both the peak construction period for the proposed Project (January 2020) and the peak cumulative condition (November 2019). Twenty-nine intersections in the vicinity of LAX were analyzed, including those roads and intersections that would most likely be used by employee and truck traffic associated with construction of the proposed Project. One significant impact would occur during January 2020 under the proposed Project. Three intersections would have significant cumulative impacts. However, with implementation of Mitigation Measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4, and MM-ST (LAMP)-5 the Project-related construction traffic impacts on intersection (Intersection #1) would be reduced to a level that is less than significant and the proposed Project's contribution to the three intersections with significant cumulative impacts (Intersections #1, #2 and #14) would not be cumulatively considerable.

4.3.8.3 Findings

Based on substantial evidence in the administrative record, including Section 4.12.3, *Construction Surface Transportation*, of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which avoid or substantially lessen the significant environmental effects identified in the Final EIR. Specifically, with incorporation of Mitigation Measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4, and MM-ST (LAMP)-5, the proposed Project will not have significant surface transportation impacts to any intersections. Beyond the Project-specific mitigation measures, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other mitigation measures would be required for these impacts as they will be less than significant.

4.4 Findings on Significant and Unavoidable Impacts

4.4.1 AESTHETICS – VISUAL CHARACTER

4.4.1.1 Impacts

A significant impact pertaining to visual character would occur if the proposed Project would result in the introduction of features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting/contrasting with important aesthetic elements or the quality of the area (such as a theme, style, setbacks, density, massing, etc.) or cause an inconsistency with applicable design guidelines.

4.4.1.2 Description of Effects

As analyzed in Section 4.1, *Aesthetics*, of the Draft EIR, operations of the proposed Project would visually impact the Theme Building. At its closest point, the APM guideway would be approximately 75 feet from the Theme Building structure. Due to the proximity of the APM guideway and operating trains on the north side, as well as the proximity of the passenger walkway for the Center CTA APM Station at approximately 20 feet

west of the Theme Building, notable public views of the Theme Building within the CTA would be degraded. The introduction of the APM guideway and pedestrian walkway within proximity to the Theme Building would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting/contrasting with important aesthetic elements or the quality of the area (such as a theme, style, setbacks, density, massing, etc.). LAWA would implement Mitigation Measure MM-A (LAMP)-1, Application of Design Features to Protect Aesthetic Context of Theme Building, to lessen the visual impact of the APM guideway to the Theme Building. However, the visual impact of the APM guideway and passenger walkways to the Theme Building would remain significant because it would introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting/contrasting with important aesthetic elements or the quality of the area (such as a theme, style, setbacks, density, massing, etc.). There are no other feasible measures available to reduce impacts to visual character further. Additionally, alternative alignments of the APM within the CTA were examined, as discussed in Section 4.7 below. Based on the alternatives analysis conducted for the proposed Project and discussed in the Draft and Final EIR, there are no feasible alternatives that would locate these project elements farther from the Theme Building. Therefore, Project-related impacts to visual character would be significant and unavoidable.

4.4.1.3 Findings

Based on substantial evidence in the administrative record, including Section 4.1, *Aesthetics,* of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which lessen the significant environmental effects identified in the Final EIR; specifically Mitigation Measure MM-A (LAMP)-1 reduces this impact. Even with incorporation of Mitigation Measure MM-A (LAMP)-1, the APM guideway and passenger walkways would result in a visual impact to the Theme Building. 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 Project-specific mitigation, the BOAC hereby finds that impacts on visual character for the proposed Project 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 proposed mitigation measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other mitigation measures are feasible that would mitigate the visual character impacts of the proposed Project.

4.4.2 AIR QUALITY

4.4.2.1 Impacts

A significant air quality impact would occur if the estimated incremental increase in operational or construction-related pollutant emissions or pollutant concentration impacts attributable to the proposed Project would be greater than the applicable thresholds developed by the South Coast Air Quality Management District (SCAQMD). Mass emission thresholds are shown in Table 4.2.1-5 on page 4.2-28 of the Draft EIR; local concentration thresholds are shown in Table 4.2.1-6 on page 4.2-31 of the Draft EIR.

4.4.2.2 Description of Effects

As discussed in Section 4.2.1, *Air Quality*, of the Draft EIR, implementation of proposed Project and potential future related development has the potential to have a significant impact on air quality, as well as a cumulatively considerable contribution to cumulative air quality impacts.

4.4.2.2.1 LAX Landside Access Modernization Program Project

Construction-Related Air Quality Impacts

As shown in Table 4.2.1-26 within Section 4.2.1, *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 VOC and NO_X. Additionally, as shown on Table 4.2.1-27 in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR, construction of the proposed Project is also predicted to result in an exceedance of the SCAQMD annual concentration threshold for PM_{10}. 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. With implementation of Standard Control Measure LAX-AQ-1, Construction-Related Air Quality Control Measures, and Mitigation Measure MM-AQ (LAMP)-1, Preferential Use of Renewable Diesel Fuel, construction-related significant impacts associated with regional emissions would be reduced, but not to a level that would be less than significant or less than cumulatively considerable, specifically for VOC and NO_X emissions. Incorporation of LAX-AQ-1 and MM-AQ (LAMP)-1 would also reduce construction-related significant impacts associated with local concentrations, but not to a level that would be less than significant or less than cumulatively considerable for PM_{10}. No other feasible mitigation measures have been identified at this time that would reduce impacts to air quality further. Therefore, impacts to regional and local air quality from Project-related construction emissions would be significant and unavoidable.

Operations-Related Air Quality Impacts

As shown on Table 4.2.1-16 within Section 4.2.1, *Air Quality*, of the Draft EIR, operations of the proposed Project is predicted to result in an exceedance of the SCAQMD annual concentration threshold for PM_{10}. With implementation of Standard Control Measure LAX-AQ-2, Transportation-Related Air Quality Control Measures, and LAX-AQ-3, Operations-Related Air Quality Control Measure, and Mitigation Measure MM-GHG (LAMP)-1, Incorporate Solar Energy into Landside Access Modernization Program Facilities, operations-related significant impacts associated with local concentrations would be reduced, but not to a level that would be less than significant, specifically for localized annual PM_{10} impacts in 2035. No other feasible mitigation measures have been identified at this time that would reduce impacts to air quality further. Therefore, impacts to local air quality associated with Project-related operational concentrations would be significant and unavoidable.

Cumulatively Considerable Contribution to Construction-Related Air Quality Impacts

In accordance with SCAQMD guidance, cumulative impacts are assessed using the same significance thresholds for project-specific and cumulative impacts. Construction of the proposed Project would exceed

the Project-specific significance construction emission thresholds for NO_X and VOC, as well as the Project-specific construction concentration threshold for PM_{10}. As a result, the contribution of the proposed Project to cumulative construction-related impacts would be cumulatively considerable for VOC, NO_X, and PM_{10}. Therefore, the proposed Project would have a cumulatively considerable contribution for construction emissions and would result in a cumulatively significant construction impact.

Cumulatively Considerable Contribution to Operations-Related Air Quality Impacts

The SCAQMD guidance states: "As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in the Environmental Assessment or EIR … Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. … Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively considerable." As stated above, even with implementation of Standard Control Measure LAX-AQ-2, Transportation-Related Air Quality Control Measures, and LAX-AQ-3, Operations-Related Air Quality Control Measure, and Mitigation Measure MM-GHG (LAMP)-1, Incorporate Solar Energy into Landside Access Modernization Program Facilities, operations-related significant impacts associated with local concentrations would be reduced, but not to a level that would be less than significant, specifically for localized annual PM_{10} impacts in 2035. No other feasible mitigation measures have been identified at this time that would reduce impacts to air quality further. Therefore, impacts to local air quality associated with Project-related operational concentrations would be cumulatively considerable.

4.4.2.2.2 LAX Landside Access Modernization Program Potential Future Related Development

Regional Operations-Related Air Quality Impacts

As shown in Table 4.2.1-33 within Section 4.2.1, *Air Quality*, of the Draft EIR, operations of the potential future related development is predicted to result in maximum daily emissions that exceed the SCAQMD regional construction thresholds for VOC and NO_X. With implementation of Standard Control Measures LAX-AQ-2 and LAX-AQ-3, and Mitigation Measure MM-GHG (LAMP)-1, operations-related significant impacts to regional emissions would be reduced, but not to a level that would be less than significant, specifically for VOC and NO_X. No other feasible mitigation measures have been identified at this time that would reduce impacts to air quality further. Therefore, impacts to regional air quality would be significant and unavoidable.

Cumulatively Considerable Contribution to Operations-Related Air Quality Impacts

The operational emissions associated with the potential future related development combined with proposed Project emissions would exceed the operational thresholds for CO, VOC, NO_X, PM_{10}, and PM2.5. As a result, the contribution of the proposed Project to cumulatively significant operational impacts would be cumulatively considerable for all of the analyzed criteria air pollutants except SO_2.

4.4.2.3 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 changes or alterations have been required in, or are incorporated into, the Project which lessen the significant environmental effects identified in the Final EIR; specifically

Mitigation Measures LAX-AQ-1, LAX-AQ-2, LAX-AQ-3, MM-AQ (LAMP)-1, and MM-GHG (LAMP)-1 reduce this impact. Even with incorporation of feasible construction-related standard control measures and mitigation measures, the maximum peak daily construction-related regional mass emissions for VOC and NO_X, as well as the local annual concentrations for PM_{10}, resulting from the proposed Project would be significant. Additionally, operations-related impacts associated with local concentrations of annual PM_{10} in 2035 would be significant. Impacts from potential future related development, even with incorporation of feasible construction-related standard control measures and mitigation measures, would remain significant for construction-related regional mass emissions for VOC and NO_X, and would be cumulatively considerable for all analyzed criteria pollutants except SO_2. 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 the following impacts significant and unavoidable: construction-related air quality impacts related to VOC, NO_X, and PM_{10} for the proposed Project; operations-related air quality impacts related to PM_{10} for the proposed Project; and operations-related air quality impacts related to VOC and NO_X for potential future related development. BOAC also hereby finds that specific economic, legal, social, technological, or other considerations make additional mitigation measures or project alternatives infeasible. Beyond the proposed Mitigation Measures identified above, which will be included in the 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.

4.4.3 CULTURAL RESOURCES – HISTORIC RESOURCES

4.4.3.1 Impacts

A significant impact pertaining to visual character would occur if the proposed Project would result in a substantial adverse change in the significance of a "historical resource" as defined by State CEQA Guidelines Section 15064.5(a). Substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the National Register, California Register, and/or local register.

4.4.3.2 Description of Effects

As analyzed in Section 4.4, *Cultural Resources*, of the Draft EIR, construction and operations of the proposed Project would alter the immediate setting of the Theme Building in a way that would reduce its ability to convey its historic significance, resulting in a significant impact. Views of the Theme Building from within the CTA, and views of the surrounding Airport from the Theme Building's interior, would be substantially altered by the location, dimensions, and design of the proposed APM guideway and passenger walkways. After construction of the APM guideway and elevated walkway, the expressive form and design of the Theme Building, which historically was viewable from all sides, would no longer be fully discernible when viewed from within close proximity to the Theme Building on the east, north and west. Its original function providing views

from its restaurant and observation deck would also be substantially reduced. However, because the Project would not result in physical alteration of the structure and materials of the Theme Building, it would remain eligible for listing in the National Register, California Register and as a LAHCM. While the physical materials and form of the Theme Building would remain intact, however, alteration of its surroundings by the Project would result in "material impairment" as defined by CEQA, because unique features of its architectural design as well as it original function would be substantially obscured, reducing its ability to convey its historic significance.

As discussed in Section 4.4.1 of these findings, LAWA would implement Mitigation Measure MM-A (LAMP)-1, Application of Design Features to Protect Aesthetic Context of Theme Building, to lessen the visual impact of the APM guideway to the Theme Building. Also, as discussed in Section 4.4, *Cultural Resources*, Mitigation Measure MM-HR (LAMP)-1, Preservation of Historic Resources: Theme Building and Setting, would be implemented to guide the preservation and future use of the Theme Building and to ensure that it is visually distinguished from the proposed new construction to maximize its level of visual prominence in the CTA. With implementation of Mitigation Measures MM-A (LAMP)-1 and MM-HR (LAMP)-1, significant impacts to the Theme Building, as a result of the construction of the APM guideway and pedestrian walkway, would be reduced, but not to a level that would be less than significant. There are no other feasible measures that could be adopted to reduce impacts to the Theme Building further while still achieving Project objectives. Alternative alignments of the APM within the CTA were examined, as discussed in Section 4.7 below. Based on the alternatives analysis conducted for the proposed Project and discussed in the Draft and Final EIR, there are no feasible alternatives that would locate these project elements farther from the Theme Building. As such, impacts to historic resources would be reduced, but not to a level that would be less than significant.

4.4.3.3 Findings

Based on substantial evidence in the administrative record, including Section 4.3, *Cultural Resources,* of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which lessen the significant environmental effects identified in the Final EIR; specifically Mitigation Measures MM-A (LAMP)-1 and MM-HR (LAMP)-1 reduce this impact. Even with incorporation of Mitigation Measures MM-A (LAMP)-1 and MM-HR (LAMP)-1, the construction and operation of the APM guideway and the elevated walkway would result in a significant and unavoidable visual impact to the Theme Building. In addition, LAWA recognizes that LAX contains unique historic resources and is committed to preserving its historic resources in a methodical and thoughtful manner. To that end, as discussed in Draft EIR Section 4.4.9, LAWA has developed a Preservation Plan for LAX resources that identifies all historic resources on LAX property, identifies historic resources that LAWA commits to preserving, provides guidance on the rehabilitation of historic buildings, structures, objects and sites located on LAX property, and creates a process for review of future projects with respect to historic resources. LAWA has committed to utilizing the LAX Preservation Plan (see Appendix J of the Draft EIR) to assist LAWA in preserving and evaluating its historic resources appropriately. 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 Project-specific mitigation and the LAX Preservation Plan, the BOAC hereby finds that impacts on the Theme Building for the proposed Project 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 proposed mitigation measures identified above, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other mitigation measures are feasible that would mitigate the historic resources impacts of the proposed Project.

4.4.4 GREENHOUSE GAS EMISSIONS

4.4.4.1 Impacts

Environmental impacts related to GHG emissions are considered significant if the proposed Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance. In identifying a quantitative basis by which to evaluate the proposed Project's impacts, the following criteria are applied:

- Proposed Project Improvements: As a transportation-related project pertaining to travel to and from LAX, would the change in travel characteristics associated with the project result in an increase in GHG emissions? If so, the impact is considered significant. This transportation-related threshold is referred to as "No Net Increase".
- Potential Future Related Development: As a mixed-use development project, would the potential future related development result in GHG emissions that exceed the efficiency thresholds recommended by the SCAQMD? The SCAQMD has suggested a 2020 target date efficiency threshold value of 4.8 $MTCO_2e$ per year per service population for projects and 2035 target date efficiency threshold value of 3.0 $MTCO_2e$ per year per service population for projects, as presented by the Stakeholder Working Group in September 2010.[1] With anticipated buildout of potential future related development by 2035, a significant impact is considered to occur if the GHG emissions exceed 3.0 $MTCO_2e$ per year per employee.

Environmental impacts related to GHG emissions would also be considered significant if the proposed Project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

[1] South Coast Air Quality Management District, *Minutes for the Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #15*, September 28, 2010, Available: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds, accessed August 2016.

4.4.4.2 Description of Effects

4.4.4.2.1 LAX Landside Access Modernization Program Project

Plan/Policy Consistency

GHG emissions associated with the proposed Project would be reduced through incorporation of standard control measures (LAX-AQ-1, Construction-Related Air Quality Control Measures, LAX-AQ-2,Transportation-Related Air Quality Control Measures, LAX-AQ-3, Operations-Related Air Quality Control Measure), as well as Project-specific mitigation measures (MM-GHG (LAMP)-1, Incorporate Solar Energy into LAX Landside Access Modernization Program Facilities, and MM-AQ (LAMP)-1, Preferential Use of Renewable Diesel Fuel). Implementation of the proposed Project would not conflict with most policies and strategies set forth in state, regional, and local plans adopted for the purpose of reducing the emissions of GHGs; however, the GHG emissions levels associated with future operation of the proposed Project in 2024 and 2035, even with mitigation would be inconsistent with the numerical targets for GHG reductions in the future that are reflected in some of those plans and policies. Notwithstanding that the future increases in GHG emissions associated with the Project, as compared to the 1990 baseline levels that are the focus of the GHG reduction plans, are the result of future passenger activity levels at LAX that are beyond the scope and control of the proposed Project and the fact that future GHG emissions levels with the proposed Project would be less than future GHG emission levels that would occur without the Project, the numerical inconsistency with the GHG reduction targets is considered to be a significant impact even with mitigation.

4.4.4.2.2 LAX Landside Access Modernization Program Potential Future Related Development

Per Capita Efficiency Threshold

As discussed in Section 4.5.8.2.2, *Mitigated Operational Emissions*, on page 4.5-68 of the Draft EIR, construction and operations of the potential future related development would result in a net decrease in GHG emissions with incorporation of standard control measures (LAX-AQ-1, Construction-Related Air Quality Control Measures, LAX-AQ-2,Transportation-Related Air Quality Control Measures, LAX-AQ-3, Operations-Related Air Quality Control Measure), as well as Project-specific mitigation measures (MM-GHG (LAMP)-1, Incorporate Solar Energy into LAX Landside Access Modernization Program Facilities, and MM-AQ (LAMP)-1, Preferential Use of Renewable Diesel Fuel). However, the sum of amortized construction and operational GHG emissions, as compared to the number of employees for the operation of the proposed development, would result in 8.5 MT CO_2e per year per employee; which exceeds the efficiency threshold of 3.0 MT CO_2e per year in 2035. As such, the impact would remain significant, even with mitigation.

Plan/Policy Consistency

GHG emissions associated with the potential future related development would be reduced through incorporation of standard control measures (LAX-AQ-1, Construction-Related Air Quality Control Measures, LAX-AQ-2,Transportation-Related Air Quality Control Measures, LAX-AQ-3, Operations-Related Air Quality Control Measure), as well as Project-specific mitigation measures (MM-GHG (LAMP)-1, Incorporate Solar Energy into LAX Landside Access Modernization Program Facilities, and MM-AQ (LAMP)-1, Preferential Use of Renewable Diesel Fuel). Implementation of the potential future related development would not conflict with

most of the policies and strategies set forth in state, regional, and local plans adopted for the purpose of reducing the emissions of GHGs; however, the GHG emissions levels associated with future operation of the potential future related development in combination with the rest of the proposed Project in 2035 would be inconsistent with the numerical targets for GHG reductions in the future that are reflected in some of those plans and policies. Notwithstanding that the future increases in GHG emissions associated with the proposed Project including the potential future related development, as compared to the 1990 baseline levels that are the focus of the GHG reduction plans, are the result of future passenger activity levels at LAX that are beyond the scope and control of the Project and the fact that future GHG emissions levels with the Project would be less than future GHG emission levels that would occur without the Project, the numerical inconsistency with the GHG reduction targets in certain plans and policies is considered, for the purposes of this EIR, to be a significant impact.

4.4.4.3 Findings

Based on substantial evidence in the administrative record, including Section 4.5, *Greenhouse Gas Emissions,* of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which lessen the significant environmental effects identified in the Final EIR; specifically Mitigation Measures LAX-AQ-1, LAX-AQ-2, LAX-AQ-3, MM-AQ (LAMP)-1, and MM-GHG (LAMP)-1 reduce this impact. Even with incorporation of feasible construction- and operations-related standard control measures and mitigation measures, the construction and operations of the proposed Project, including potential future related development, would be numerically inconsistent with GHG reduction targets. Therefore impacts related to GHG policy/plan consistency would be significant. Additionally, construction and operation of potential future related development would result in an unavoidable significant impact with respect to the per capita efficiency thresholds. There are not any additional feasible mitigation measures that could be adopted at this time to further reduce these impacts to below significance.

Despite incorporation of standard control measures that are mitigation measures, , and Project-specific mitigation measures, the BOAC hereby finds the greenhouse gas impacts for the proposed Project, including potential future related development, 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 proposed mitigation measures identified above, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other greenhouse gas mitigation measures are feasible that would mitigate the anticipated impacts from the proposed Project, including potential future related development, to global climate change.

4.4.5 PUBLIC SERVICES - SCHOOLS

4.4.5.1 Impacts

A significant impact on schools would occur if the proposed Project would result in a substantial adverse physical impact associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.

4.4.5.2 Description of Effects

The proposed Project would involve development on the 135-acre site currently known as Manchester Square. Implementation of the proposed Project may include the acquisition of the site that currently contains the existing Stella Middle Charter and Bright Star Secondary Charter Academies, both located at 5431 W. 98th Street within Manchester Square, should the school site not be acquired as part of the existing LAWA Aircraft Noise Mitigation Program (ANMP). The relocation of these schools has been identified as part of LAWA's ongoing ANMP; no other public school facilities are located on parcels that would be impacted by construction of the proposed Project. Construction and operation of Stella Middle Charter and Bright Star Secondary Charter Academies at new sites could cause significant impacts. While the relocation of these school facilities would be evaluated in any required Los Angeles Unified School District (LAUSD) CEQA documents, this would be an indirect impact caused by the proposed Project. As such, construction of the proposed Project could result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Impacts to these schools would be significant. LAWA would implement Mitigation Measure MM-PS (LAMP)-1, School Relocations, to provide moving assistance to these two schools as part of any relocation effort. However, because implementation of Mitigation Measure MM-PS (LAMP)-1 is within the responsibility and jurisdiction of a public agency other than LAWA (i.e., LAUSD), LAWA cannot require it to be implemented. Significant impacts associated with school relocations may not be reduced to less than significant if LAUSD does not adopt effective mitigation measures or if mitigation is infeasible. In that case, the proposed Project's indirect impacts on school facilities would remain significant and unavoidable.

4.4.5.3 Findings

Based on substantial evidence in the administrative record, including Section 4.11, *Public Services,* of the Draft EIR, the BOAC hereby finds and determines that changes or alterations which lessen the significant environmental effects identified in the Final EIR are the responsibility of another agency, which can and should by adopted by that agency; specifically Mitigation Measure MM-PS (LAMP)-1 reduces this impact, and can and should be adopted by LAUSD. Even with incorporation of Mitigation Measure MM-PS (LAMP)-1, relocation of the schools within Manchester Square could result in a significant and unavoidable impact. As implementation of mitigation would not be the responsibility of LAWA, 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 Project-specific mitigation, the BOAC hereby finds that impacts to existing schools as a result of the proposed Project 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 proposed mitigation measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other mitigation measures are feasible that would mitigate the school relocation impacts of the proposed Project.

4.4.6 OFF-AIRPORT TRAFFIC

4.4.6.1 Impacts

The off-airport traffic analysis included intersections and freeway segments, among other analyses. Study intersections were evaluated for potential significant traffic impacts based on the significant traffic impact criteria adopted and accepted by various jurisdictions that the study intersections lie in. Intersections lying on the boundary of multiple jurisdictions were evaluated using the more conservative criteria. Specific intersection criteria for jurisdictions within the study area are discussed in Section 4.12.2.4 of the Draft EIR.

Per consultation with Caltrans, a project would have a significant impact on freeway segments if any of following conditions were met for either the a.m. or p.m. peak hours:

- When an auxiliary lane is present, there is a significant impact when the queue exceeds the lesser of one-half the length of the auxiliary lane or 1,000 feet, which creates a speed differential between the auxiliary lane and the adjacent lane.
- If the Project-related traffic conditions cause the LOS to deteriorate to below LOS F. If a freeway segment is already at LOS F, then an increase in the demand/capacity ratio of greater than 1 percent determined by comparing the future with Project conditions to the future without Project conditions would result in a significant impact.

4.4.6.2 Description of Effects

4.4.6.2.1 LAX Landside Access Modernization Program Project

2024

As shown in Table 4.12.2-18 within Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, six of 183 intersections under the 2024 Future With Project scenario would be significantly impacted in one or more peak hours. This includes Intersections 84, 93, 115, 117, 119, and 136, as shown on Figure 4.12.2-4 and Figure 4.12.2-5 of the Draft EIR. However, through implementation of the following mitigation measures, impacts would be reduced to less than significant.

- MM-ST (LAMP)-9. Modify the Intersection of Airport Boulevard and Century Boulevard.
- MM-ST (LAMP)-10. Modify the Intersection of Arbor Vitae Street and Concourse Way-Isis Avenue.
- MM-ST (LAMP)-11. Modify the Intersection of La Cienega Boulevard and Arbor Vitae Street.
- MM-ST (LAMP)-12. Modify the Intersection of La Cienega Boulevard and Century Boulevard.
- MM-ST (LAMP)-13. Modify the Intersection of La Cienega Boulevard and Florence Avenue.
- MM-ST (LAMP)-14. Modify the Intersection of Inglewood Avenue and Century Boulevard.
- MM-ST (LAMP-19. I-405 Northbound Auxiliary Lane.
- MM-ST (LAMP)-20. Imperial Highway Off-ramp.
- MM-ST (LAMP)-21. La Cienega Boulevard Additional Lane.

Under the 2024 Future With Project scenario, the proposed Project would not result in significant impacts at any of the 23 freeway mainline segments during the morning and/or evening peak hours. Additionally, the proposed Project would not result in significant impacts to HOV facilities, on- or off-ramps, or freeway arterial intersections.

2035

As shown in Table 4.12.2-20 within Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, eight of 183 intersections under the 2035 Future With Project scenario would be significantly impacted in one or more peak hours. This includes Intersections 65, 93, 104, 115, 116, 117, 119, and 136, as shown on Figure 4.12.2-6 and Figure 4.12.2-7 of the Draft EIR. However, through implementation of the following mitigation measures, impacts at all but one intersection would be reduced to less than significant:

- MM-ST (LAMP)-10. Modify the Intersection of Arbor Vitae Street and Concourse Way-Isis Avenue.
- MM-ST (LAMP)-11. Modify the Intersection of La Cienega Boulevard and Arbor Vitae Street.
- MM-ST (LAMP)-12. Modify the Intersection of La Cienega Boulevard and Century Boulevard.
- MM-ST (LAMP)-13. Modify the Intersection of La Cienega Boulevard and Florence Avenue.
- MM-ST (LAMP)-14. Modify the Intersection of Inglewood Avenue and Century Boulevard.
- MM-ST (LAMP)-15. Modify the Intersection of I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway.
- MM-ST (LAMP)-16. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard.
- MM-ST (LAMP)-17. Modify the Intersection of Sepulveda Boulevard and Century Boulevard.
- MM-ST (LAMP)-18. Modify the Intersection of La Brea Avenue/Hawthorne Boulevard and Century Boulevard.

The 2035 Future With Project condition would result in one intersection (La Cienega Boulevard and Arbor Vitae Street) with a significant unavoidable impact which would also be cumulatively considerable. No feasible further mitigation measures are available to reduce this impact to a less than significant level that are in LAWA's control. Right-of-way within the City of Inglewood would be required to further reduce the impact at this intersection. Working closely with Inglewood, LAWA proposed ITS improvements along La Cienega Boulevard (including the intersection of La Cienega Boulevard and Arbor Vitae Street) and along Century Boulevard (Mitigation Measure MM-ST (LAMP)-7); this mitigation measure would further reduce the significant impact at the La Cienega Boulevard at Arbor Vitae Street intersection, but the impact would remain significant and unavoidable.

The City of Inglewood has expressed, in meetings with LAWA staff, its intent not to widen this intersection due to potential indirect effects to the neighboring residential community in Inglewood. Because of the City of Inglewood's opposition to this mitigation measure and potential effects to residential areas, this improvement is infeasible.

Additionally, under the 2035 With Project conditions, one freeway segment, the I-405 at La Cienega Boulevard (northbound), would be significantly impacted and would also be a cumulatively considerable impact. Implementation of Mitigation Measure MM-ST (LAMP)-22, I-405 Corridor and Network Connectivity Enhancements, would include LAWA's fair share contribution to I-405 mobility improvements; however, this mitigation measure would not mitigate the significant impact to less than significant levels. Impacts to this freeway segment would be significant and unavoidable.

In some cases, it was determined that mitigation would not be feasible due to right-of-way issues, physical constraints, other planned improvements, or motorist safety concerns. In other cases, the recommended mitigation would mitigate an impact, but not to a level less than significant. Incorporating mitigation, as listed above, the proposed Project would result in significant and unavoidable impacts to one intersection (La Cienega Boulevard and Arbor Vitae Street) and a cumulatively considerable impact on one freeway segment (I-405 at La Cienega Boulevard) for Future 2035 conditions.

4.4.6.2.2 LAX Landside Access Modernization Program Potential Future Related Development

As shown in Table 4.12.2-31 within Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, 11 of 183 intersections under the 2035 Future With Project scenario would be significantly impacted in one or more peak hours. This includes Intersections 63, 65, 93, 104, 115, 116, 117, 119, 130, 136, and 147, as shown as shown on Figure 4.12.2-8 and Figure 4.12.2-9 of the Draft EIR. However, through implementation of the following mitigation measures, impacts at all but one intersection would be reduced to less than significant:

- MM-ST (LAMP)-10. Modify the Intersection of Arbor Vitae Street and Concourse Way-Isis Avenue.
- MM-ST (LAMP)-11. Modify the Intersection of La Cienega Boulevard and Arbor Vitae Street.
- MM-ST (LAMP)-12. Modify the Intersection of La Cienega Boulevard and Century Boulevard.
- MM-ST (LAMP)-13. Modify the Intersection of La Cienega Boulevard and Florence Avenue.
- MM-ST (LAMP)-14. Modify the Intersection of Inglewood Avenue and Century Boulevard.
- MM-ST (LAMP)-15. Modify the Intersection of I-105 Freeway Ramps (east of Aviation Boulevard) and Imperial Highway.
- MM-ST (LAMP)-16. Modify the Intersection of La Cienega Boulevard and Manchester Boulevard.
- MM-ST (LAMP)-17. Modify the Intersection of Sepulveda Boulevard and Century Boulevard.
- MM-ST (LAMP)-18. Modify the Intersection of La Brea Avenue/Hawthorne Boulevard and Century Boulevard.

The 2035 Future With Project and potential future related development condition would result in one intersection (La Cienega Boulevard and Arbor Vitae Street) with a significant unavoidable impact which would also be cumulatively considerable. No feasible further mitigation measures are available to reduce this impact to a less than significant level that are in LAWA's control. Right-of-way within the City of Inglewood would be required to further reduce the impact at this intersection (see discussion above). Additionally, under the 2035 With Project and potential future related development conditions, three freeway segments, the I-405 at La Cienega Boulevard, I-405 at La Tijera Boulevard, and I-105 at Crenshaw Boulevard would be significantly

impacted. With implementation of Mitigation Measures MM-ST (LAMP)-22, MM-ST (LAMP)-23, MM-ST (LAMP)-24, including LAWA's fair share contribution to I-405 mobility and ITS improvements and I-105 ITS improvements, impacts would be less than significant for the I-105 at Crenshaw Boulevard freeway segment. However, these improvements would not mitigate the significant impact at the I-405 segments to less than significant levels. Impacts to the following two northbound freeway segments would be significant and unavoidable and cumulatively considerable: the I-405 at La Cienega Boulevard and the I-405 at La Tijera Boulevard.

Additionally, because implementation of physical mitigation to the State highway system is within the responsibility and jurisdiction of a public agency other than LAWA (i.e., Caltrans), LAWA cannot require it to be implemented. Significant impacts associated with cumulative impacts to freeway segments may not be reduced to less than significant if Caltrans does not adopt effective mitigation measures or if mitigation is infeasible. In that case, the proposed Project's impacts on the I-405 at La Cienega Boulevard, I-405 at La Tijera Boulevard, and I-105 at Crenshaw Boulevard would remain significant and unavoidable.

4.4.6.3 Findings

Based on substantial evidence in the administrative record, including Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, and Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR, the BOAC hereby finds that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant off-airport traffic impacts related to intersections and freeway segments that may result from the proposed Project. Specifically, Project-specific mitigation measures MM-ST (LAMP)-6 through MM-ST (LAMP)-24 will be incorporated into the Project's design.

Despite incorporation of these measures, the BOAC hereby finds the impact at intersection 117 (La Cienega Boulevard and Arbor Vitae Street) and three freeway segments (the I-405 at La Cienega Boulevard, I-405 at La Tijera Boulevard, and I-105 at Crenshaw Boulevard) will remain significant and unavoidable and that specific economic, legal, social, technological, or other considerations make additional mitigation measures or Project alternatives infeasible.

Additionally, BOAC hereby finds that the three freeway segments identified above where feasible mitigation measures are recommended are located outside the jurisdiction of the City of Los Angeles, and such improvements are within the responsibility and jurisdiction of another public agency other than the City of Los Angeles. Section 15091(a)(2) of the State CEQA Guidelines indicates that where this condition occurs relative to recommended mitigation measures:

> "Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency."

Relative to the recommended mitigation measures presented above, the following list delineates those mitigation measures that are wholly or partially outside the jurisdiction of the City of Los Angeles and within the responsibility and jurisdiction of another public agency:

- MM-ST (LAMP)-22. I-405 Corridor and Network Connectivity Enhancements.
- MM-ST (LAMP)-23. I-105 Freeway Intelligent Transportation System (ITS) Improvements.
- MM-ST (LAMP)-24. I-405 Freeway Intelligent Transportation System (ITS) Improvements.

If the intersection improvements and related mitigation measures described above are implemented as recommended, the impacts would be mitigated as described above. Should the improvements that occur outside the City of Los Angeles not be implemented by the other agencies having responsibility and jurisdiction for those intersections, the residual impact will remain significant and unavoidable.

4.4.7 CONSTRUCTION SURFACE TRAFFIC – TEMPORARY TRAFFIC, ACCESS AND TRANSIT

4.4.7.1 Impacts

A significant impact on traffic during construction would occur if the proposed Project would result in one or more of the following conditions:

- Result in temporary lane, alley, or street closures within a major or secondary highway right-of-way for more than one day.
- Result in the loss of regular vehicular or pedestrian access to Airport, commercial, or industrial facilities for more than one day.
- Result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route.

4.4.7.2 Description of Effects

As discussed in Section 4.12.3, *Construction Surface Transportation*, temporary traffic, access, and transit impacts during construction were evaluated for the proposed Project, , including potential future related development. Construction activities and related construction vehicle trips associated with the proposed Project, including potential future related development. would impact on-Airport and off-Airport traffic roadway operations. To the extent that Project-related construction would require temporary lane closures and detours, on-Airport and off-Airport traffic conditions could be impacted. In addition to lane and roadway restrictions, it is anticipated that crosswalks, bike paths, and pedestrian pathways may be restricted or closed for a period of time; however, alternate routes would be provided. It is anticipated that construction of the proposed Project would result in the loss of regular vehicular or pedestrian access to some Airport facilities for more than one day and/or result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Airport. Impacts to traffic during construction would be significant. However, to reduce the impact on traffic during construction activities, LAWA would implement Mitigation Measures MM-ST (LAMP)-1, Construction Traffic Project Force; MM-ST (LAMP)-2, Maintenance of Traffic; MM-ST (LAMP)-3, Worksite Traffic Control Plans; MM-ST (LAMP)-4, Roadway Closure Restrictions; and MM-ST (LAMP)-5, Traffic Maintenance During Construction. With implementation of these mitigation measures, significant impacts associated with temporary lane, alley, or street closures, loss of regular vehicular or pedestrian access, and temporary loss for more than one day of an existing bus stop or rerouting of a bus route would be reduced, but not to a level that would be less than significant. Thus, impacts would be significant and unavoidable.

4.4.7.3 Findings

Based on substantial evidence in the administrative record, including Section 4.12.3, *Construction Traffic,* of the Draft EIR, the BOAC hereby finds and determines that changes or alterations have been required in, or are incorporated into, the Project which lessen the significant environmental effects identified in the Final EIR; specifically Mitigation Measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4 and MM-ST (LAMP)-5 reduce this impact. Even with incorporation of the mitigation measures MM-ST (LAMP)-1, MM-ST (LAMP)-2, MM-ST (LAMP)-3, MM-ST (LAMP)-4 and MM-ST (LAMP)-5, construction-related surface traffic impacts associated with temporary lane, alley, or street closures, loss of regular vehicular or pedestrian access, and temporary loss for more than one day of an existing bus stop or rerouting of a bus route would be significant and unavoidable. 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 Project-specific mitigation, the BOAC hereby finds that construction traffic impacts for the proposed Project 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 proposed mitigation measure identified above, which will be included in the Mitigation Monitoring and Reporting Program for the proposed Project, no other mitigation measures are feasible that would mitigate construction traffic impacts of the proposed Project.

4.5 Findings on Impacts Related to Plan Amendments

Chapter 7, Evaluation of Amendments to the LAX Plan and LAX Specific Plan, of the Draft EIR, and Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR, describe the LAX Plan and LAX Specific Plan amendments proposed in conjunction with the proposed Project, and provide an evaluation of potential environmental impacts associated with those amendments. The majority of amendments to the LAX Plan and LAX Specific Plan are administrative and Project-related changes; however, there are a few additional actions related to revisions of the LAX Plan and LAX Specific Plan:

- Clarification of the language regarding limitation on the number of off-airport parking spaces;
- Removal of the language regarding limitation on the number of gates at LAX; and
- Removal of the language regarding FlyAways.

The removal of this language is a policy change, and not a physical change to the Airport environment; therefore, environmental impacts were analyzed in a general qualitative nature. The analysis In Draft EIR Section 7.3 found that the proposed LAX Plan and LAX Specific Plan Amendments would not result in environmental impacts materially different from those addressed in detail in Chapter 4 of the Draft EIR.

4.6 Findings on Other CEQA Considerations

4.6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 6.2 of the Draft EIR identifies the significant and irreversible environmental changes associated with the proposed Project. Such impacts will include commitment of various natural, physical, human, and fiscal resources. Most of the land proposed to be used for the proposed Project is already dedicated to Airport uses. The acquisition areas are currently in other urban areas with developed uses, such as residential, commercial, and industrial uses, and would be converted to primarily Airport use under the proposed Project.

Construction of the proposed Project would require a commitment of resources that would include: (1) building materials, (2) fuel for construction equipment and machinery, and (3) fuel for the transportation of materials, construction workers, and vendors to and from the Project site. Construction would require the consumption of resources that are non-replenishable or may renew so slowly that they are considered non-renewable. These resources would include: raw materials in steel; metals such as copper and lead; aggregate materials such as sand and stone used in concrete and asphalt; petrochemical construction materials such as plastics; and water. This would represent the loss of non-renewable resources, which are generally not retrievable. Aggregate resources are locally constrained, but regionally available. Their use would not have a Project specific adverse effect upon the availability of these resources.

Operation of the proposed Project would result in additional consumption of nonrenewable resources including electricity, natural gas, and various transportation-related fuels. This would represent a loss of non-renewable resources, which are generally not retrievable. However, the proposed Project would comply with the newly developed LAX Design Guidelines, which incorporate sustainability measures into new development at LAX. Certain measures that would reduce the use of non-renewable resources during operations include: compliance with enhanced construction waste reduction goals; exceeding the California Energy Code requirements by 15 percent; and providing readily accessible areas for the depositing, storage, and collection of non-hazardous materials for recycling. In addition, the proposed Project would result in irreversible impacts to air quality from emissions of criteria pollutants and greenhouse gases (GHG). However, project design features and mitigation measures, including implementation of the LAX Design Guidelines, would be incorporated to reduce air quality and GHG impacts.

Construction and operation of the proposed Project would also require consumption of potable water. Implementation of the proposed Project would include water consumption for various construction-related purposes such as concrete production, equipment cleaning, certain activities such as pavement saw-cutting, and dust control. The proposed Project would also generate a demand for water due to potable water use in restroom and food service facilities; car and train washing operations; fire water systems; and landscaping. However, as indicated in Section 4.13, *Utilities and Service Systems*, with incorporation of the LAX Design Guidelines, the proposed Project construction and operational impacts on water use would be less than significant. However, the proposed Project would result in an irretrievable consumption of water, which is a limited resource.

4.6.2 GROWTH INDUCING IMPACTS

Section 6.3 of the Draft EIR addresses the potential growth inducing impacts of the proposed Project, including population, housing and employment growth and the growth in LAX passenger activity levels. As indicated therein, the proposed Project does not include residential or business development, nor would it directly induce population growth.

Construction of the proposed Project would not include any permanent or temporary residential structures that would induce population growth directly through the construction of housing. Although the Project proposes roadway and utility improvements to existing roads and infrastructure, it would not involve the extension of roads or other infrastructure into undeveloped areas. Therefore, the proposed Project would not indirectly induce population growth through the extension of roads or other infrastructure into undeveloped areas. Construction of the proposed Project would also provide the ability for unemployed individuals, who already reside locally within the Project Area, to participate in construction employment opportunities. As such, construction workers would likely commute from the local Los Angeles area and would not require a relocation of their residency as a consequence of the construction job opportunities generated by the proposed Project. Similarly, any employees associated with operations of the proposed Project would likely commute from the local Los Angeles area similar to existing patterns for LAX-badged employees. Employment generated by the potential future related development would be consistent with the projected employment growth for jurisdictions included in the Population and Housing Study Area, and the proposed Project would not directly or indirectly create new jobs not included in these projections. In summary, the proposed Project would not directly or indirectly induce population, housing, or employment growth.

Reduced traffic congestion in the CTA associated with the proposed Project would not directly or indirectly induce LAX passenger growth. The proposed Project would not directly or indirectly cause passenger growth, which could occur with or without the proposed Project. Based on FAA guidance and Airport Cooperative Research Program (ACRP) studies, reduced traffic congestion in the CTA and other enhancements in passenger convenience provided by the proposed Project are not primary consideration in passengers' decisions to travel to, from or through LAX, and how often they travel. Many other primary factors such as airfare prices and flight schedules more directly influence these decisions. In addition, based on ACRP studies, relieving traffic congestion in the CTA would not cause airlines to change their business decisions regarding adding more seats and flights at LAX, and would not directly increase the Airport's capacity for additional passengers. Therefore, the proposed Project would not directly or indirectly cause passenger growth, which could occur with or without the proposed Project. Further evidence supporting these conclusions is presented in Chapter 2, *Comments and Responses*, of the Final EIR,

4.7 Findings on Project Alternatives

4.7.1 ALTERNATIVES CONSIDERED AND REJECTED

In addition to the six alternatives that were evaluated in detail in the Draft EIR, LAWA considered ten additional alternatives, all of which were eliminated from detailed analysis in the Draft EIR either because they

did not meet the basic Project objectives, would fail to avoid or substantially lessen the significant impacts, and/or were determined at the outset to be infeasible. These alternatives are discussed below.

4.7.1.1 Automated People Mover Alignment Alternatives (CTA)

As discussed in Draft EIR Section 5.4.1.1.1, in March 2015, LAWA staff conducted an alternatives analysis of the APM alignment within the CTA, examining different vertical (below grade, at grade, and above grade) and horizontal alignments, as well as the number and location of the APM stations.[2] Through this analysis, LAWA determined it was infeasible to construct a below grade or at grade alignment within the CTA. Based on the number of underground utilities and infrastructure beneath grade, this alignment option was considered infeasible. Similarly, development of an at-grade APM alignment would prohibit ongoing airport operations within the CTA during construction. Therefore, based on this analysis, all alignments analyzed include elevated guideways. As a result of the analysis, the following APM alternatives were considered viable: these are described in greater detail:

- **2-Station Spine Alternative**. This alternative would be located above Center Way throughout the alignment inside the CTA. One station would be located between Parking Garages P1 and P7, and the second station would be located between Parking Garages P3 and P4. Elevated pedestrian walkways would be utilized to connect the stations to the adjacent terminal buildings.
- **4-Station Scissor Alternative**. This alternative consists of a split APM alignment utilizing two corridors through the CTA: the northern section that runs parallel to World Way North and the southern section that runs parallel to World Way South. Both the north and southern sections would each have two stations, for a total of four stations. Stations along the northern alignment would be located to the south of Terminal 3 and to the north of the Theme Building. Stations along the southern alignment would be located to the north of Terminal 5 and to the south of Parking Garage P7, between Terminals 6 and 7. Elevated pedestrian walkways would be utilized to connect the stations to the adjacent terminal buildings.
- **4-Station Hybrid Alternative**. This alternative is a hybrid of the 3-Station Spine Alternative and the 4-Station Scissor Alternative. The northern section of the alignment is the same as the 3-Station Spine Alignment, including the locations of the APM stations. However, this alignment also includes a new track spur and two additional stations to the south. The two additional southern stations would be located to the south of the LAX Theme Building and at the northeast corner of Parking Garage P7. Elevated pedestrian walkways would be utilized to connect the stations to the adjacent terminal buildings.

[2] City of Los Angeles, Los Angeles World Airports, *LAX Connected, Board of Airport Commissioners Ground Transportation Workshop*, May 5, 2014, Available: http://www.connectinglax.com/files/5.5.14_BOAC.Briefing_LAX.Connected.pdf.

As discussed in Chapter 3 of the Final EIR, in 2014, LAWA staff conducted an alternatives analysis of the APM alignment[3] examining different vertical and horizontal alignments. Among the horizontal alignment alternatives, an elevated "loop" alignment was evaluated within the CTA. Three options were considered for this alignment, including (1) terminal/airside, (2) World Way, and (3) parking garages. Below is an evaluation of each of these options as they relate to construction and operational feasibility:

- **Terminal/Airside:** Construction of an integrated APM guideway and stations within the existing terminals/airfield would be infeasible within the current terminal/airfield configuration/constraints. Reconstruction of each terminal would be tremendously costly and severely impact access to the passenger terminals and aircraft gates during construction. Therefore, due to the severe impact to airport operations, as well as potential economic infeasibility, this alignment option was considered infeasible.
- **World Way:** The structural integrity of the existing Upper World Way, could not withstand the loading requirements of the APM. Reconstruction of this roadway to withstand the additional load of an APM would be extremely costly and severely impact access to the passenger terminals during construction. Construction of an elevated APM alignment along Lower World Way would require a construction right-of-way of up to 60 feet, or the equivalent of four lanes of roadway and a sidewalk. After construction, this APM alignment would result in the permanent removal of up to two roadway lanes for the placement of APM support columns. Removal of these lanes would severely impact vehicular access to the passenger terminals within the CTA. Therefore, due to the severe impact to airport operations, as well as potential economic infeasibility, this alignment option was considered infeasible.
- **Parking Garages:** Construction of this alternative would require substantial structural changes to the existing parking garages within the CTA. During construction of this alternative, the already constrained existing parking capacity within the CTA would decrease by approximately 40 percent during the estimated 4-year construction period.[4] Therefore, because of the substantial demolition required and the temporary reduction in CTA parking, this alignment option was considered infeasible.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of these alternatives infeasible and rejects the design options under these alternatives because their basic design characteristics are similar to, and/or fall within the range of, the alternatives carried forth for detailed analysis in the Draft EIR. Additionally, these alternatives would not avoid or substantially reduce any of the significant effects of the Project.

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[3] City of Los Angeles, Los Angeles World Airports, LAX Connected, Board of Airport Commissioners Ground Transportation Workshop, May 5, 2014, Available: http://www.connectinglax.com/files/5.5.14_BOAC.Briefing_LAX.Connected.pdf.

[4] City of Los Angeles, Los Angeles World Airports, LAX Connected, Board of Airport Commissioners Ground Transportation Workshop, May 5, 2014, Available: http://www.connectinglax.com/files/5.5.14_BOAC.Briefing_LAX.Connected.pdf.

4.7.1.2 LAX Master Plan Automated People Mover Alignment Alternative

As discussed in Draft EIR Section 5.4.1.1.2, in the 2004 Master Plan, LAWA sought to address congestion problems by proposing transportation facilities that would provide new options for passengers and employees to access the passenger terminal areas. These facilities, which were approved at a programmatic level in 2004, included an APM system connecting a consolidated rental car facility, intermodal transportation facilities, and the CTA. The APM studied in the LAX Master Plan EIR/EIS includes two separate, but coordinated routes. One route would connect the intermodal transportation facility and the consolidated rental car facility to the CTA along a route that generally would follow W. 98th Street and Aviation Boulevard. A second route would connect the ground transportation center with the CTA via a route that would be located along the south side of Century Boulevard.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects the design options under this alternative because its basic design characteristics are similar to, and/or fall within the range of, the alternatives carried forth for detailed analysis in the Draft EIR. Additionally, this alternative would not avoid or substantially reduce any of the significant effects of the Project.

4.7.1.3 LAX Specific Plan Amendment Study (SPAS) Automated People Mover Alignment Alternative

As discussed in Draft EIR Section 5.4.1.1.2, in July 2012, LAWA prepared the LAX Specific Plan Amendment Study (SPAS), which identified 9 alternatives, two of which contained an APM alignment. Alternative 3 reflected the implementation of the APM alignment proposed under the LAX Master Plan Alternative D. Alternative 9 was a ground access improvement alternative that included a single APM alignment connecting the consolidated rental car facility, intermodal transportation facilities, and the CTA. The elevated alignment studied in the SPAS Final EIR generally follows W. 98th Street from the CTA to just east of Aviation Boulevard in Manchester Square.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects the design options under this alternative because its basic design characteristics are similar to, and/or fall within the range of, the alternatives carried forth for detailed analysis in the Draft EIR. Additionally, this alternative would not avoid or substantially reduce any of the significant effects of the Project.

4.7.1.4 Personal Rapid Transit Alternative

As discussed in Draft EIR Section 5.4.1.1.3, the Personal Rapid Transit (PRT) alternative was suggested during the NOP process and would consider personal rapid transit pods (which could include a fleet of battery powered, driverless pods) each of which could transport up to four passengers and their luggage from the CONRAC and ITFs to the CTA via an elevated guideway that would follow the upper roadway and the upper levels of the CTA parking garages. Alternatively, this alternative could place these pods at grade which would cross busy roadway intersections.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not avoid or substantially reduce any of the significant effects of the Project. Further, the proposed APM trains would serve a much larger population per train, thus better reducing congestion near the CTA and related vehicle emissions. This alternative would require a dedicated guideway and reconfiguration of the Airport access roadways and CTA garages, and would impact views of the Theme Building.

4.7.1.5 Terminal 8 APM Station Alternative

As discussed in Draft EIR Section 5.4.1.1.5, the Terminal 8 APM Station Alternative was suggested during the NOP process; it provides for an additional APM station at Terminal 8. The Project currently provides for access to Terminal 8 via an approximately 25-foot-wide single-level pedestrian walkway, which would connect the East CTA APM Station Terminals 1, 7, and 8. The pedestrian walkways would bridge above World Way and connect to Terminals 1, 7, and 8 with elevator and escalator access to both the arrival and departure levels.

The proposed alignment of the APM would provide for walkways between the East CTA APM station and Terminal 1 and Terminals 7 and 8, with an estimated distance of 220 feet and 240 feet, respectively, and walk time of 3.6 minutes. Providing an additional APM station between Terminal 7 and 8, would require a scissors alignment, which would increase impacts on the Theme Building and 1961 ATCT, increase Project costs due to construction of additional guideway and an additional station, and increase commute time from the CONRAC and ITFs for all passengers; the increased commute time means this alternative would not achieve the Project objectives as well as the proposed Project.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not avoid or substantially reduce any of the significant effects of the Project.

4.7.1.6 Constrained Growth Alternative

As discussed in Draft EIR Section 5.4.1.1.4, another alternative suggested during the NOP process was one based on the low end of the SCAG forecast for LAX, below 82.9 MAP. However, the SCAG 2016–2040 RTP/SCS forecasts states air passenger demand within the SCAG region will increase from 91.2 million annual passengers in 2014 to 136.2 million annual passengers by year 2040; representing a 1.6 percent annual growth rate. For the purposes of this EIR, impact analyses were based on current FAA forecasts, which are reasonably consistent with SCAG forecasts. See growth inducement section of Chapter 6, *Other Environmental Considerations,* of the Draft EIR.

In terms of future operations, future passenger activity was based on the FAA Terminal Area Forecast, reasonably consistent with SCAG projections. LAWA has analyzed future traffic conditions with these future passenger activity levels along with SCAG projected growth in population and employment for the area. Due to federal grant obligations and federal law, LAWA does not have the authority without FAA approval to

restrict airline operations or force airlines to operate at other airports, which FAA has not granted any airport since 1990.[5] Similarly, LAWA cannot make changes to the Airport that would restrict its capacity or affect access without approval from the FAA.[6] For these reasons, the constrained growth alternative was deemed infeasible and eliminated from further analysis.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it is logistically and legally infeasible.

4.7.1.7 Multi-Level CONRAC Alternative

As discussed in Draft EIR Section 5.4.1.1.6, A multi-level CONRAC alternative was identified during the NOP process; it consists of an eight-level CONRAC facility with a corresponding reduced building footprint. The main components of the CONRAC facility include the Customer Service Building (CSB), Rental Car Ready/Return Parking Area, Quick Turnaround Area (QTA), QTA Support and Additional Site Functions, and Idle Storage. These components are arranged for passenger convenience and accessibility to the APM and the CSB.

The multi-level CONRAC alternative would reduce the length and width of the building, by adding vertical levels to the facility. Additional levels proposed by this alternative would increase passenger driving and turnaround time, hinder ready access to the CSB, and negatively impact overall user/passenger convenience. The proposed CONRAC facility has been designed to allow each existing rental car company (consisting of three main companies that have multiple brands) to consolidate all operations on their own level. Splitting these operations amongst different levels would be operationally challenging and inefficient. Additionally, adding more levels to the CONRAC would be more expensive, and would not avoid or substantially lessen the proposed Project's significant impacts.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not avoid or substantially reduce any of the significant effects of the Project.

4.7.1.8 Subterranean Parking – No CONRAC Alternative

As discussed in Draft EIR Section 5.4.1.1.7, the Subterranean Parking – No CONRAC Alternative was identified during the NOP process; it proposes a subterranean parking structure in the Manchester Square area. While this alternative would provide for additional parking in the Project area, it would not consolidate rental car companies in one location and would not eliminate rental car shuttle traffic in the CTA.

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[5] *See* Airport Noise and Capacity Act of 1990, 49 U.S.C. §§ 47521-33; 14 C.F.R. Part 161. *See also*, 49 U.S.C. § 47101(a)(1) (airport to be made available for public use).

[6] See 49 U.S.C. § 47107(a)(16).

The CONRAC, as proposed, meets one of the Projects main objectives to provide for provide easier and more efficient access to rental cars, thereby increasing passenger convenience, and conforms with the LAX Plan and the Specific Plan. This alternative would not meet that fundamental Project objective. Further, due to the significant excavation and cost associated with this alternative, the Subterranean Parking – No CONRAC Alternative is not feasible, and was not carried forward for further analysis.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not meet a fundamental objective of the proposed Project, would not avoid or substantially reduce any of the significant effects of the Project, and is economically infeasible.

4.7.1.9 Construction Phasing Alternative

As discussed in Draft EIR Section 5.4.1.2, the Construction Phasing Alternative is an integrated alternative; however, construction of various components of the Project would be completed at different intervals and phasing would be extended with completion of the proposed Project in 2040. The goal of the Construction Phasing Alternative was to reduce short-term construction emissions and traffic impacts. All roadway improvements not essential for servicing each facility would be implemented during a later phase of construction. Under the Construction Phasing Alternative, construction of the proposed Project would occur in five separate phases.

The delayed phasing and construction approach was initially considered with regard to short-term air quality and transportation impacts associated with the LAX Landside Access Modernization Program. While this alternative would reduce daily emissions and the daily construction-related trip generation, it would increase the overall duration of air pollutant emissions and construction traffic on local roadways. In order to reduce construction emissions to a less than significant level, the phasing of the Project would be greatly extended, increasing costs, delaying Project benefits, increase duration of construction, construction-related emissions, and construction traffic in the area, and would not avoid or substantially lessen the proposed Project's significant impacts.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not avoid or substantially reduce any of the significant effects of the Project.

4.7.1.10 No ITF Parking Structures Alternative

As discussed in Draft EIR Section 5.4.1.3, the No ITF Parking Structures Alternative would eliminate the multi-level interconnected public parking structures at both the ITF West and the ITF East. This alternative would still include the construction of the APM stations and direct internal roadway access to the APM stations. Under this alternative, the proposed site for the ITF West would remain in its current state as a surface parking lot, primarily referred to as Lot C. The 25-acre lot adjacent to Lot C, currently occupied by Avis Rent a Car, would be converted to surface parking. Additionally, the area at the ITF East would become a paved surface parking lot. This alternative would allow for 4,600 parking spaces, 13,000 fewer than the 17,600 spaces

provided by the proposed Project. The No ITF Parking Structures Alternative would result in an increase in off-airport parking needs, and as such, private companies would continue to develop land for private, remote public parking facilities, similar to the No Project Alternative.

The BOAC hereby finds that specific economic, legal, social, technological, or other considerations make the adoption of this alternative infeasible and rejects this alternative because it would not meet the basic proposed Project objectives to relieve congestion on Airport and surrounding roadways, and would not avoid or substantially reduce any of the significant effects of the Project.

4.7.2 ALTERNATIVES CARRIED FORWARD FOR FULL EVALUATION (DRAFT EIR SECTIONS 5.4.2 AND 5.5)

4.7.2.1 Alternative 1, No Project Alternative

Under the "No Project" alternative, none of the improvements and activities proposed for the LAX Landside Access Modernization Program would occur and the proposed plan amendments included in the Project would not be implemented. The proposed Project areas would continue to be used for airport parking, existing roadways, existing private development, and other various uses at the site. Private parking operators would likely expand operations in order to capitalize on the expected growth in air passengers at LAX that would occur irrespective of the proposed Project. Rental car facilities would also expand based on the projected passenger growth, which would be the same as under the proposed Project.

4.7.2.1.1 LAX Landside Access Modernization Program Project

Aesthetics

As the No Project Alternative entirely omits the proposed APM, this alternative would avoid the significant impact that would occur under the proposed Project with respect to aesthetics and visual resources. Impacts would be less than significant.

Air Quality

As the No Project Alternative would not involve any construction, it would not have the significant unavoidable impacts that would occur under the proposed Project with respect to construction-related regional emissions of VOC, and NO_X, and to local concentrations of PM_{10}. Operational emissions under the No Project Alternative would be higher than under the proposed Project due to increased vehicle miles traveled. The traffic increase under the No Project Alternative relative to the proposed Project is caused by the reduced level of non-road mobility elements that are associated with the APM and CONRAC. Therefore, operational impacts to both regional emissions and local concentrations would be higher under the No Project Alternative than under the proposed Project.

Nonetheless, as the No Project 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 PM_{10}, VOC, and NO_X emissions. With respect to operational emissions, the No Project Alternative would result in increased regional emissions, and would increase local concentrations impacts above the levels

found to be significant for PM_{10} under the proposed Project. Therefore, this alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to operational air quality emissions.

Cultural Resources

As the No Project Alternative entirely omits the proposed APM, this alternative would avoid the significant impact that would occur under the proposed Project with respect to historic resources. Impacts would be less than significant.

Greenhouse Gas Emissions

The GHG emissions under the No Project Alternative would be greater than those under the proposed Project due to the increase in traffic volume and associated emissions; therefore, impacts would be significant. The No Project Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to GHG emissions.

Public Services

Similar to the proposed Project, the No Project Alternative would not include residential development and would therefore not have a direct impact on student generation or demand for school services. Under this alternative, LAWA would still utilize the Manchester Square site for other landside improvements, including the relocation of the existing commercial vehicle holding lot. As such, the existing Stella Middle Charter and Bright Star Secondary Charter Academies would still be acquired, resulting in a significant impact. Similar to the proposed Project, LAWA would implement mitigation to provide moving assistance to these two schools as part of any relocation effort. The LAUSD would also be required to complete any required CEQA compliance prior to relocation of the schools to other sites to evaluate and mitigate significant impacts of the school relocation. However, as discussed in Section 4.11.3, *Schools*, of the Draft EIR, the proposed Project may still result in a significant impact as mitigation would be required by a third party. Therefore, the No Project Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to schools.

Off-Airport Traffic

The No Project Alternative would not involve any of the construction activities associated with the development of the proposed Project, including roadway improvements. Therefore, the physical roadway network would generally be consistent with existing conditions. As discussed in Section 5.5.1.1 of the Draft EIR, the level of service of several roadway links and intersections would be reduced under the No Project Alternative; without the proposed Project improvements, traffic congestion would worsen in the vicinity of the Airport. Thus, traffic impacts are anticipated to be greater under the No Project Alternative. Impacts would be significant.

Construction Traffic

The No Project Alternative would not involve any of the construction activities associated with the development of the proposed Project. Construction traffic associated with demolition, construction of new

facilities, delivery of materials and hauling, and employee trips that would be required for the construction of the proposed Project would not occur. Although the No Project Alternative would involve construction of additional off-Airport parking and rental car facilities, the No Project Alternative entirely avoids the proposed Project's construction traffic impacts, which would be greater than the No Project Alternative. Thus, the No Project Alternative would have less impact than the proposed Project with respect to construction traffic. Impacts would be less than significant.

4.7.2.1.2 LAX Landside Access Modernization Program Potential Future Related Development

Air Quality

The No Project Alternative would not involve construction of the proposed Project or potential future related development; therefore, it would have no net increase in short-term and temporary emissions of criteria air pollutants. Under the No Project Alternative, improvements associated with the proposed Project, and therefore the potential future related development, would not be constructed. Therefore, operational emissions under the No Project Alternative would be higher than under the proposed Project due to increased vehicle miles traveled from the absence of transportation-related improvements. The traffic increase under the No Project Alternative relative to the proposed Project is caused by the absence of project-level mobility elements. Therefore, operational impacts to both regional emissions and local concentrations would be higher under the No Project Alternative than under the proposed Project.

Nonetheless, as the No Project Alternative would not involve any construction of Project- or Program-level components, this alternative would result in less construction emissions than the proposed Project. With respect to operational emissions, the No Project Alternative would result in increased regional emissions, and would increase local concentrations impacts than under the proposed Project. Therefore, this alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to operational air quality emissions. The No Project Alternative may have less impact than the proposed Project with respect to construction-related emissions, but it is speculative to determine what would occur on these parcels if the No Project Alternative is enacted.

Greenhouse Gas Emissions

The GHG emissions under the No Project Alternative would be greater than those under the proposed Project due to the increase in traffic volume and associated emissions; therefore, impacts would be significant. The No Project Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Off-Airport Traffic

The No Project Alternative would not involve any of the construction activities associated with the development of the proposed Project, including roadway improvements or potential future related development. Therefore, the physical roadway network would generally be consistent with existing conditions. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, potential future related development under the proposed Project would have a significant and unavoidable impact on one

intersection and three freeway mainline segments. Under the No Project Alternative, it is expected that intersections would operate at a reduced level of service. The level of service of several roadway links and intersections would be reduced under the No Project Alternative; without the proposed Project improvements, traffic congestion would worsen in the vicinity of the Airport. Thus, traffic impacts are anticipated to be greater under the No Project Alternative.

Construction Traffic

Under the No Project Alternative, improvements associated with the proposed Project, and therefore the potential future related development, would not be constructed. However, LAWA would continue to acquire the remaining parcels in the Belford and Manchester Square areas as part of LAWA's ANMP, and some of this land may be available for future development. In addition, LAWA would not enact amendments to the LAX Plan and LAX Specific Plan that would limit the allowable development on the residual parcels. Construction traffic associated with demolition, construction of new facilities, delivery of materials and hauling, and employee trips that would be required for the construction of potential future related development with any facilities in these areas would occur. Due to the uncertainty of the type and timing of any development on the potential future related development parcels, it is speculative to assess whether the No Project Alternative would have a significant impact related to construction traffic. Each project would need to be evaluated to determine potential effects and any required mitigation.

4.7.2.1.3 Findings

For reasons discussed above, the BOAC hereby rejects the No Project Alternative. While significant impacts would be avoided or substantially lessened for aesthetics, cultural resources, and construction surface transportation, this Alternative would not meet any of the objectives of the proposed Project, including: providing new access options to LAX, including a direct connection to transit and easier and more efficient access to rental cars; relieving congestion in the CTA and on the surrounding street system; promoting the sustainability of LAX by improving efficiency and operations of the surface transportation system; nor would it enhance and integrate new facilities with existing structures, both inside and outside the CTA.

4.7.2.2 Alternative 2, No APM Alternative

The No APM Alternative, Alternative 2, proposes the construction of all Project components with the exception of the APM system, including the guideway, stations, pedestrian walkways, and APM Maintenance and Storage Facility (MSF). Additionally, this alternative would not provide for a direct connection with the proposed Metro AMC 96th Street Transit Station. This alternative is proposed because it would avoid the adverse impacts of APM construction and operation.

Without an APM, busing or shuttles would be provided to facilitate the movement of customers to and from the CONRAC and the CTA. Under this alternative, LAWA would coordinate with various rental car agencies to be housed in the CONRAC to develop a circular shuttle route between the CTA and the CONRAC to minimize congestion. LAWA would also restrict commercial vehicles within the CTA to reduce traffic volumes. Commercial vehicles would likely utilize the ITFs, similar to the proposed Project; however, passengers would use shuttle buses to and from these facilities instead of an APM system.

Under the No APM Alternative, all of the proposed Project components would be constructed except for the APM system and associated facilities. The No APM Alternative would meet the proposed Project's objectives to enhance the passenger experience by providing new access options; provide easier and more efficient access to rental cars, but it would not achieve these objectives to the same extent as the proposed Project; and enhance and integrate the overall design of the proposed Project facilities with existing CTA structures and new airport facilities both inside and outside the CTA. However, the No APM Alternative would not include construction of the APM and associated facilities, and therefore would not provide a direct connection to transit. Also, without the APM, this alternative would not provide the same congestion relief of the CTA and surrounding streets as the proposed Project.

In accordance with the State CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the No APM Alternative would be the environmentally superior alternative relative to the other alternatives. Without the APM guideway, the No APM Alternative would result in less construction related impacts to air quality, greenhouse gases, and construction surface transportation. However, the proposed Project would result in fewer vehicle miles traveled and thus, less GHG emissions.

While the No APM Alternative is considered the environmentally superior alternative, it would not avoid the significant unavoidable impacts that would occur under the proposed Project with respect to construction- or operational-related emissions, greenhouse gas emissions or off-airport traffic impacts. Additionally, the proposed Project would result in fewer vehicle miles traveled and thus, less GHG emissions. The No APM Alternative would not reduce the number of commercial vehicles on the Airport or surrounding roadway network, would not provide a direct connection to transit, would not enhance the passenger experience by providing new access options for all modes of travel, would not provide easier or more efficient access to rental cars and non-CTA parking facilities; thus for these reasons, this alternative does not meet the project objectives as identified in the EIR.

4.7.2.2.1 LAX Landside Access Modernization Program Project

Aesthetics

As the No APM Alternative entirely omits the proposed APM, this alternative would avoid the significant impact that would occur under the proposed Project with respect to aesthetics and visual resources. Impacts would be less than significant.

Air Quality

The No APM Alternative entirely omits this portion of the construction; therefore, it would have reduced short-term and temporary emissions of criteria air pollutants as compared to the proposed Project. However, it is expected that construction-related impacts would be significant. Operational emissions would be higher under the No APM Alternative than under the proposed Project due to increased vehicle miles traveled. The traffic increase relative to the proposed Project is due to the use of shuttles or buses to transport CONRAC, commercial vehicle shuttles, and parking users between the CTA, CONRAC and ITFs, instead of the APM.

Therefore, operational impacts to both regional emissions and local concentrations would be higher under the No APM Alternative than under the proposed Project.

Nonetheless, as the No APM Alternative would involve much less construction, this alternative would have lower impacts than would occur under the proposed Project with respect to construction-related PM_{10}, VOC, and NO_X emissions. With respect to operational emissions, the No APM Alternative would result in increased regional emissions, and would potentially increase local concentrations impacts above the levels found to be significant and unavoidable for PM_{10} under the proposed Project. Therefore, operational impacts under the No APM Alternative would be significant and would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Cultural Resources

As the No APM Alternative entirely omits the proposed APM, this alternative would avoid the significant impact that would occur under the proposed Project with respect to historic resources. Impacts would be less than significant.

Greenhouse Gas Emissions

The GHG emissions under the No APM Alternative would be greater than those under the proposed Project due to the increase in traffic volume and associated emissions. The traffic increase under the No APM Alternative relative to the proposed Project is due to the use of shuttles or buses to transport CONRAC users between the CTA and CONRAC, instead of the APM. Therefore, GHG impacts from the No APM Alternative would be significant and would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Public Services

Similar to the proposed Project, the No APM Alternative would not include residential development and would therefore not have a direct impact on student generation or demand for school services. However, under this alternative, LAWA would still require development of the Manchester Square area for the CONRAC. As such, the acquisition of the site currently containing the existing Stella Middle Charter and Bright Star Secondary Charter Academies would occur prior to construction. The relocation of these schools would result in a significant impact. Similar to the proposed Project, LAWA would implement mitigation to provide moving assistance to these two schools as part of any relocation effort. LAUSD would also be required to complete any required CEQA compliance prior to relocation of the schools to other sites to evaluate and mitigate significant impacts of the school relocation. However, as discussed in Section 4.11.3, *Schools*, of the Draft EIR, the proposed Project may still result in a significant impact as mitigation would be required by a third party. Therefore, the No APM Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to schools.

Off-Airport Traffic

The No APM Alternative proposes the construction of all proposed Project components with the exception of the APM system and associated facilities. To facilitate the movement of customers, busing or shuttles would

be provided to and from the ITFs, CONRAC, and the CTA. Under this alternative, LAWA would coordinate with various rental car agencies to be housed in the CONRAC to develop a loop route for the shuttle between the CTA and the CONRAC to minimize congestion, and avoid construction activities for other portions of the proposed Project. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, the proposed Project would have a less than significant impact at all intersections with incorporation of mitigation. Incorporating similar mitigation measures, the No APM Alternative would have similar impacts to the proposed Project with respect to off-Airport traffic. Therefore, the No APM Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to off-airport traffic.

Construction Traffic

Construction activities and related construction vehicle trips associated with the No APM Alternative would impact on- and off-Airport traffic roadway operations. To the extent that Project-related construction would require temporary lane closures and detours, off-Airport traffic conditions could be impacted. In addition to lane and roadway restrictions, it is anticipated that crosswalks, bike paths, and pedestrian pathways may be restricted or closed for a period of time; alternate routes would be provided. It is anticipated that construction of the No APM Alternative would result in the loss of regular vehicular or pedestrian access to some facilities for more than one day and/or result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Project area. Although impacts to traffic during construction would be less than under the proposed Project, impacts would remain significant even with incorporation of mitigation measures.

4.7.2.2.2 LAX Landside Access Modernization Program Potential Future Related Development

Alternative 2, the No APM Alternative, would eliminate the APM system, including the guideway, stations, pedestrian walkways, and APM MSF. However, this alternative would not affect the location, scale, or timing of the potential future related development. Thus, this alternative would have similar impacts for all resource categories when compared to potential future related development as part of the proposed Project. Impacts to air quality, greenhouse gas emissions, off-airport traffic and construction traffic would all be significant.

4.7.2.2.3 Findings

The No APM Alternative would not meet the project objectives as identified in the EIR, including: providing new access options to LAX, including a direct connection to transit and easier and more efficient access to rental cars; or relieving congestion in the CTA and on the surrounding street system.. While significant impacts would be avoided or substantially lessened for aesthetics and cultural resources,, it would not reduce the project's significant and unavoidable impacts to air quality, greenhouse gas emissions, public services, or transportation/traffic to a less than significant level In light of the above analysis, the BOAC hereby rejects the No APM Alternative evaluated in the Draft EIR and finds that it will not avoid the significant and unavoidable impacts of the Project related to air quality, greenhouse gas emissions, public services or off-airport traffic, and would not satisfy most of the Project's objectives.

4.7.2.3 Alternative 3, Reduced Phase 1 Improvements Alternative

Alternative 3, the Reduced Phase 1 Roadway Improvements Alternative, includes all of the improvements and activities proposed for the LAX Landside Access Modernization Program. However, all roadway improvements that are not immediately essential for servicing Phase 1 facilities would be implemented during Phase 2 of Project construction. This alternative is proposed because it would delay construction impacts of Phase 1 roadways to Phase 2, thereby reducing construction impacts related to air quality, greenhouse gas emissions, noise, and traffic. Under this alternative, the ITF East and the east garage of the ITF West would be completed in Phase 2 of the Project. Roadway improvements to be completed in Phase 1 under Alternative 3 are listed below. All remaining roadway and facility improvements would be completed in Phase 2 of the proposed Project.

- W. 98th Street four-lane extension from Aviation Boulevard to S. La Cienega Boulevard.
- Widening of S. La Cienega Boulevard to provide three lanes in the southbound direction between W. Arbor Vitae Street and W. Century Boulevard.
- Widening of Aviation Boulevard to three lanes in both directions between the W. 98th Street extension and W. Arbor Vitae Street.
- Four-lane extension of I-105 on- and off- ramps to 111th Street from Imperial Highway (with interim passenger pick-up/drop-off location during Phase 1 construction within Lot E).
- Provision of four-lane New "A" Street between Westchester Parkway and W. Century Boulevard to provide access to the ITF West rotary.
- Provision of an additional eastbound lane along W. Arbor Vitae Street from the CONRAC exit to S. La Cienega Boulevard.
- Eastbound W. Century Boulevard widening to five lanes between Avion Drive and Aviation Boulevard.
- Demolition of Sky Way from World Way North to the W. 96th Street Bridge. Access to the W. 96th Street bridge over Sepulveda Boulevard would still be accessible from southbound Sepulveda Boulevard via W. 96th Street west of Sepulveda Boulevard.
- New ramps from southbound Sepulveda Boulevard to both the arrivals and departures levels.
- Provision of a rotary around the ITF West including a vehicular drop-off/pick-up area.
- Concourse Way from W. Century Boulevard to W. Arbor Vitae Street.

Under Alternative 3, all of the proposed Project components would be constructed; however, the phasing of roadway and ITF components would be modified. Alternative 3 would meet all of the proposed Project's objectives. Alternative 3 would result in deferring the full benefits of the Project to traffic congestion within the CTA and surrounding streets until later years.

4.7.2.3.1 LAX Landside Access Modernization Program Project

Aesthetics

As the same structures would be constructed under the Reduced Phase 1 Improvements Alternative as the proposed Project, specifically the APM, this alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to aesthetics and visual resources. Impacts would remain significant and unavoidable.

Air Quality

Under the Reduced Phase 1 Improvements Alternative, all of the proposed Project components would be constructed; however, the phasing of roadway and ITF components would be modified. As such, the peak level of construction would potentially be reduced and may have lower increases in short-term emissions of criteria air pollutants. However, impacts would remain significant. Additionally, under the Reduced Phase 1 Improvements Alternative, there may be a temporary increase in traffic congestion, and therefore traffic-related emissions, associated with the modified phasing of the proposed components. However, operational emissions would not substantially differ under the Reduced Phase 1 Improvements Alternative than under the proposed Project as all of the Project elements would ultimately be constructed. Therefore, operational impacts to both regional emissions and local concentrations under the Reduced Phase 1 Improvements Alternative are expected to be similar to the proposed Project.

Although the Reduced Phase 1 Improvements Alternative would involve less construction in the Phase 1 construction period, and would potentially have lower impacts than would occur under the proposed Project with respect to construction-related PM_{10}, VOC, and NO_X emissions, the construction related air quality impacts would likely remain significant for these pollutants. With respect to operations, the Reduced Phase 1 Improvements Alternative would be similar to the proposed Project with respect to regional emissions, as well as local concentrations impacts - which were found to be significant and unavoidable for PM_{10} under the proposed Project. Therefore, construction and operational impacts under the Reduced Phase 1 Improvements Alternative would likely be significant and would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Cultural Resources

As with the proposed Project, the Reduced Phase 1 Improvements Alternative would not result in the demolition of any historic building; however, the demolition of the Administration Building could damage, destroy, or reduce the integrity or significance of the 1961 ATCT. Similar to the proposed Project, a mitigation measure would be implemented under Alternative 3 to preserve the character-defining features of the 1961 ATCT in accordance with the Secretary of the Interior's Standards for Rehabilitation. As discussed in Section 4.4, *Cultural Resources*, of the Draft EIR, the proposed Project would have a significant and unavoidable visual impact to the Theme Building as a result of the APM Guideway. Similar to the proposed Project, the Reduced Phase 1 Improvements Alternative would result in the introduction of the same structures that would reduce the level of visual prominence of the Theme Building within the CTA, thus reducing its ability to convey its historical significance. Similar to the proposed Project, mitigation measures would be implemented under the

Reduced Phase 1 Improvements Alternative to guide the preservation and future use of the Theme Building and to visually distinguish proposed new construction to maximize its level of visual prominence in the CTA. Development under the Reduced Phase 1 Improvements Alternative would also adhere to the architectural standards established within the LAX Design Guidelines to ensure visual compatibility of proposed Project with the Theme Building. However, the same structures as the proposed Project would be constructed under the Reduced Phase 1 Improvements Alternative. Therefore, the Reduced Phase 1 Improvements Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to historic resources. Impacts would remain significant and unavoidable.

Greenhouse Gas Emissions

As all Project components would ultimately be constructed under the Reduced Phase 1 Improvements Alternative, the GHG emissions from this alternative would not substantially differ from the proposed Project. Therefore, GHG impacts from the Reduced Phase 1 Improvements Alternative would be significant and would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Public Services

The Reduced Phase 1 Improvements Alternative would not include residential development and would therefore not have a direct impact on student generation or demand for school services. Similar to the proposed Project, Alternative 3 would require development of the Manchester Square area for the CONRAC. As such, the acquisition of the site currently containing the existing Stella Middle Charter and Bright Star Secondary Charter Academies would still be required, resulting in a significant impact. Similar to the proposed Project, LAWA would implement mitigation to provide moving assistance to these two schools as part of any relocation effort. LAUSD would also be required to complete any required CEQA compliance prior to relocation of the schools to other sites to evaluate and mitigate significant impacts of the school relocation. However, as discussed in Section 4.11.3, *Schools*, of the Draft EIR, the proposed Project may still result in a significant impact as mitigation would be required by a third party. Therefore, the Reduced Phase 1 Improvements Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to schools. Impacts would be significant.

Off-Airport Traffic

The Reduced Phase 1 Improvements Alternative includes all facilities as the proposed Project; however, construction phasing for certain roadway and ITF components would be shifted from Phase 1 to Phase 2. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, the proposed Project would have a less than significant impact at all intersections with incorporation of mitigation. Incorporating similar mitigation measures, the No APM Alternative would have similar impacts to the proposed Project with respect to off-Airport traffic. However, in 2024, three additional intersections would be significantly impacted as compared to the proposed Project, including:

- Airport Boulevard and Westchester Parkway/W. Arbor Vitae Street;
- Airport Boulevard and W. 98th Street; and
- Aviation Boulevard and Century Boulevard.

Additional mitigation measures at the three additionally significantly impacted intersections would need to be implemented under the Reduced Phase 1 Improvements Alternative; but the impacts under this alternative could be mitigated. These mitigation measures would be:

- Airport Boulevard and Westchester Parkway/Arbor Vitae Street. The improvement would provide a separate right-turn lane on the westbound approach. The westbound approach would have a left-turn lane, two through lanes and a separate right-turn lane. Implementation of this improvement would fully mitigate the significant impact at this location.
- Airport Boulevard and 98th Street. Implementation of TDM Program would fully mitigate the significant impact at this location.
- Airport Boulevard and Century Boulevard. The improvement would provide a signal modification to include a southbound right-turn overlap arrow, allowing right-turning vehicles to proceed at the same time the eastbound left-turn turn arrow is green. This improvement would require the prohibition of 'U'-turns in the eastbound direction. Implementation of this improvement would fully mitigate the significant impact at this location. If the prohibition of eastbound U-turns is not approved by LADOT, then this intersection would remain significantly impacted.

With implementation of these mitigation measures, plus those identified for the proposed Project, impacts to off-Airport traffic in 2024 would be less than significant.

Impacts for the horizon year of 2035 under the Reduced Phase 1 Improvements Alternative would be similar to those under the proposed Project. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR the proposed Project would have an unavoidable significant impact at one intersection that cannot be mitigated. The Reduced Phase 1 Improvements Alternative would have similar impacts to the proposed Project with respect to off-Airport traffic and would result in a significant unavoidable impact.

Construction Traffic

Construction activities and related construction vehicle trips associated with the Reduced Phase 1 Improvements Alternative would impact on- and off-Airport traffic roadway operations. To the extent that Project-related construction would require temporary lane closures and detours, off-Airport traffic conditions could be impacted. In addition to lane and roadway restrictions, it is anticipated that crosswalks, bike paths, and pedestrian pathways may be restricted or closed for a period of time; alternate routes would be provided. It is anticipated that construction of the Reduced Phase 1 Improvements Alternative would result in the loss of regular vehicular or pedestrian access to some facilities for more than one day and/or result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Project area. Although impacts to traffic during construction would be less than under the proposed Project, impacts would remain significant even with incorporation of mitigation measures.

4.7.2.3.2 LAX Landside Access Modernization Program Potential Future Related Development

Alternative 3, Reduced Phase 1 Roadway Improvements Alternative, would only change the phasing of Project-level components from Phase 1 to Phase 2, and therefore would not affect the location, scale, or timing of the potential future related development. Thus, this alternative would have similar impacts for all resource categories when compared to potential future related development as part of the proposed Project. Impacts to air quality, greenhouse gas emissions, off-airport traffic and construction traffic would all be significant.

4.7.2.3.3 Findings

For reasons discussed above, the BOAC hereby rejects the Reduced Phase 1 Improvements Alternative evaluated in the Draft EIR. Although the Reduced Phase 1 Improvements Alternative would meet all the Project's objectives, BOAC hereby finds that it will not avoid or substantially lessen the significant and unavoidable impacts of the Project related to aesthetics, air quality, cultural resources, greenhouse gas emissions, public services, off-airport traffic, or construction traffic.

4.7.2.4 Alternative 4, One ITF Parking Structure Alternative

As with the proposed Project, secondary roadways within the Manchester Square area would need to be demolished. The majority of the site would still be developed as the CONRAC facility. However, under Alternative 4, the parking structure at the ITF East site would not be constructed, which would reduce construction and operational impacts of this Project component. The area originally intended for the ITF East public parking garage would be a surface parking lot with approximately 1,400 parking spaces, 6,900 fewer than the 8,300 parking spaces provided by the ITF East public parking structure proposed as part of the Project. Even though 8,000 parking spaces would be provided at the ITF West public parking garage, Alternative 4 would still result in an increase in off-Airport parking needs, and as such, private companies would continue to develop land for private, remote public parking facilities.

Alternative 4 assumes the ITF East APM Station would have the same location as in the proposed Project. The station would be elevated above Aviation Boulevard, located approximately 1,000 feet south of W. Arbor Vitae Street and approximately 1,500 feet north of W. Century Boulevard. Much of the APM station's internal configuration would remain the same, yet access to the elevated structure would be provided to/from the proposed surface lot via escalators and elevators.

Under the One ITF Parking Structure Alternative, all of the proposed Project components would be constructed except for the public parking garage at the ITF East. This alternative would meet all of the proposed Project's objectives.

4.7.2.4.1 LAX Landside Access Modernization Program Project

Aesthetics

The One ITF Parking Structure Alternative would implement all of the proposed Project components except the public parking garage at the ITF East. As generally the same structures would be constructed under the One ITF Parking Structure Alternative as the proposed Project, specifically the APM, this alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to aesthetics and visual resources. Impacts would remain significant and unavoidable.

Air Quality

The One ITF Parking Structure Alternative would implement all of the proposed Project components except the public parking garage at the ITF East. Under this alternative, regional construction emissions would be slightly reduced due to a reduced amount of construction needed for a surface parking lot at the ITF East instead of a multilevel parking structure. Reduced construction activity under this alternative may also slightly reduce peak localized concentrations, depending on scheduling. Therefore, this alternative may have lower increases in short-term emissions of criteria air pollutants.

Operational emissions would not substantially differ under the One ITF Parking Structure Alternative than under the proposed Project since almost all of the Project elements would still be constructed. The reduction in parking spaces at the ITF East would not affect overall parking demand at the Airport; it is assumed that this demand would be accommodated by local private parking lots. Therefore, operational impacts to both regional emissions and local concentrations under the One ITF Parking Structure Alternative are expected to be similar to the proposed Project.

The One ITF Parking Structure Alternative may involve slightly less construction in the peak construction period, thus would potentially have lower impacts than would occur under the proposed Project with respect to construction-related PM_{10}, VOC, and NO_X emissions. With respect to operations, the One ITF Parking Structure Alternative would be similar to the proposed Project with respect to regional emissions, as well as local concentrations impacts, which were found to be significant and unavoidable for PM_{10} under the proposed Project. Therefore, construction and operational related impacts under the One ITF Parking Structure Alternative would likely remain significant and would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Cultural Resources

As with the proposed Project, the One ITF Parking Structure Alternative would not result in the demolition of any historic building; however, the demolition of the Administration Building could damage, destroy, or reduce the integrity or significance of the 1961 ATCT. Similar to the proposed Project, a mitigation measure would be implemented under the One ITF Parking Structure Alternative to preserve the character-defining features of the 1961 ATCT in accordance with the Secretary of the Interior's Standards for Rehabilitation. As discussed in Section 4.4, *Cultural Resources*, of the Draft EIR, the proposed Project would have a significant and unavoidable visual impact to the Theme Building as a result of the APM Guideway. Similar to the

proposed Project, the One ITF Parking Structure Alternative would result in the introduction of the same structures that would reduce the level of visual prominence of the Theme Building within the CTA. Similar to the proposed Project, mitigation measures would be implemented under the One ITF Parking Structure Alternative to guide the preservation and future use of the Theme Building and to ensure that it is visually distinguished from the proposed new construction to maximize its level of visual prominence in the CTA. Development under the One ITF Parking Structure Alternative would also adhere to the architectural standards established within the LAX Design Guidelines to ensure visual compatibility of proposed Project with the Theme Building. However, the same structures as the proposed Project would be constructed under the One ITF Parking Structure Alternative; therefore, the One ITF Parking Structure Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to historic resources. Impacts would remain significant and unavoidable.

Greenhouse Gas Emissions

As almost all of the Project components would be constructed under the One ITF Parking Structure Alternative, the GHG emissions from this alternative would not substantially differ from the proposed Project. Therefore, GHG impacts from the One ITF Parking Structure Alternative would be significant and would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Public Services

Similar to the proposed Project, the One ITF Parking Structure Alternative would not include residential development and would therefore not have a direct impact on student generation or demand for school services. However, under this alternative, LAWA would still require development of the Manchester Square area for the CONRAC. As such, the acquisition of the site currently containing the existing Stella Middle Charter and Bright Star Secondary Charter Academies would still be required, resulting in a significant impact. Similar to the proposed Project, LAWA would implement mitigation to provide moving assistance to these two schools as part of any relocation effort. LAUSD would also be required to complete any required CEQA compliance prior to relocation of the schools to other sites to evaluate and mitigate significant impacts of the school relocation. However, as discussed in Section 4.11.3, *Schools*, of the Draft EIR, the proposed Project may still result in a significant impact as mitigation would be required by a third party. Therefore, the One ITF Parking Structure Alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to schools.

Off-Airport Traffic

The One ITF Parking Structure Alternative would consist of all proposed Project components except for the public parking structure at the ITF East. The site without the public parking structure would still include the development of an APM station and internal circulation, as well as development of a surface parking lot. Under the 2024 conditions for the One ITF Parking Structure Alternative, traffic in the study area would generally be consistent with the proposed Project. Overall, the One ITF Parking Structure Alternative would significantly impact the same 6 intersections as under the proposed Project. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, the proposed Project would have a less than significant impact at all intersections with incorporation of mitigation. Incorporating similar mitigation measures, the One ITF

Parking Structure Alternative would have similar impacts to the proposed Project with respect to off-Airport traffic in 2024. Impacts would be less than significant.

Under the 2035 conditions for the One ITF Parking Structure Alternative, traffic in the study area would generally be consistent with the proposed Project. Overall, the One ITF Parking Structure Alternative would significantly impact the same 8 intersections as under the proposed Project. As discussed in Section 4.12.2, *Off-Airport Transportation*, the proposed Project would have an unavoidable significant impact at one intersection that cannot be mitigated. The One ITF Parking Structure Alternative would have similar impacts to the proposed Project with respect to off-Airport traffic and would result in a significant unavoidable impact.

Construction Traffic

Construction activities and related construction vehicle trips associated with the One ITF Parking Structure Alternative would impact on- and off-Airport traffic roadway operations. To the extent that Project-related construction would require temporary lane closures and detours, off-Airport traffic conditions could be impacted. In addition to lane and roadway restrictions, it is anticipated that crosswalks, bike paths, and pedestrian pathways may be restricted or closed for a period of time; alternate routes would be provided. It is anticipated that construction of the One ITF Parking Structure Alternative would result in the loss of regular vehicular or pedestrian access to some facilities for more than one day and/or result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Project area. Although impacts to traffic during construction would be less than under the proposed Project, impacts would remain significant even with incorporation of mitigation measures.

4.7.2.4.2 LAX Landside Access Modernization Program Potential Future Related Development

Alternative 4, the One ITF Parking Structure Alternative, would omit the construction of one ITF public parking garage, thereby reducing the number of parking spaces at the ITF East. However, these changes would not affect the location, scale, or timing of the potential future related development. Thus, this alternative would have similar impacts for all resource categories when compared to potential future related development as part of the proposed Project. Impacts to air quality, greenhouse gas emissions, off-airport traffic and construction traffic would all be significant.

4.7.2.4.3 Findings

For reasons discussed above, the BOAC hereby rejects the One ITF Parking Structure Alternative evaluated in the Draft EIR. Although the One ITF Parking Structure Alternative would meet all the Project's objectives, BOAC hereby finds that it will not avoid or substantially lessen the significant and unavoidable impacts of the Project related to aesthetics, air quality, cultural resources, greenhouse gas emissions, public services, off-airport traffic, or construction traffic.

4.7.2.5 Alternative 5, Increased Transportation Demand Management Program Alternative

Alternative 5 modifies features of Mitigation Measure MM-ST (LAMP)-6 to achieve a greater participation in the TDM program, approximately 20 percent of employees. The 20 percent TDM program focuses on

expanding from the 5 percent TDM Program focus on LAX-site employees only (see Section 4.12.2.9.1) to the greater LAX-Gateway Area employee base. The projected LAX-area employees – based upon assumed LAX employee growth over the LAMP horizon years of 2024 and 2035 – are projected to increase to 56,300 employees by the 2024 horizon year, and to over 62,500 employees by the 2035 horizon year.

The current number of employees working within the Gateway to LAX Business Improvement District (Gateway BID) boundaries is just over 14,000 people. A total of 15,500 employees are anticipated in the Gateway BID area by the 2024 horizon year, and a total of 17,500 employees are anticipated in the Gateway BID area by the 2035 horizon year.

LAWA would prepare a LAX TDM Program that includes, but is not limited to the following:

- The formation of a Los Angeles International Airport – Gateway BID Area Transportation Management Organization (TMO) from which to organize and offer alternative transportation programs and benefits to area employees.
- Origin/Destination-based data to organize the following transportation amenities/opportunities for LAX-area employees:
  - Enhanced vanpool program opportunities
  - Enhanced carpool opportunities
  - Transit passes and "first/last mile" transportation for employees residing within two miles of Metro light rail transit stations
  - Employee shuttle program for TMO-based employees that reside within 10 miles of the TMO boundaries, prioritized for employees living within SB 535 designated disadvantaged communities
  - New car-share program opportunities, including "Anytime Mobility" programs to provide either on-site car-share for emergency personal transport or needed employment-related car transport, AND/OR to provide Transportation Network Company (TNC) car service to employees for personal emergency transport or work-related transport needs

The Increased Transportation Demand Management Program Alternative was developed to avoid or substantially lessen the proposed Project's significant impacts related to air quality, greenhouse gas emissions, and off-airport traffic for future horizon years 2024 and 2035. Under the Increased TDM Alternative, all of the proposed Project components would be constructed. This alternative would meet all of the proposed Project's objectives, but would have the same impacts as the proposed Project.

4.7.2.5.1 LAX Landside Access Modernization Program Project

Aesthetics

The Increased TDM Program Alternative would result in the implementation of all the proposed Project components; however, it would assume a greater participation in the TDM Program. Implementation of an increased TDM program under Alternative 5 would not change the physical components of any facilities under

the proposed Project. Construction and operation of the components under Alternative 5 would result in similar changes to the visual character of the Project site compared to the proposed Project. Similar to the proposed Project, construction of Alternative 5 would not be out of character with the construction activities currently occurring within the Project area and would not result in a substantial change in views within the area. Under Alternative 5, similar screening and appropriate buffer mechanisms would be incorporated to reduce outside public views of construction activities. As discussed in Section 4.1, *Aesthetics*, of the Draft EIR, the proposed Project would have a significant and unavoidable visual impact, including aesthetics and visual character, to the Theme Building as a result of the APM Guideway. However, as the same structures would be constructed under Alternative 5 as the proposed Project, this alternative would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to aesthetics and visual resources. Impacts would remain significant and unavoidable.

Air Quality

The Increased TDM Program Alternative would result in the implementation of all the proposed Project components and would not change the physical components of any facilities. Therefore, construction emissions for this alternative would be the same as under the proposed Project. Thus, this alternative would have similar construction-related impacts from criteria air pollutant emissions. Initially, operational emissions under Alternative 5 would not substantially differ from the proposed Project since all of the Project elements would be constructed. However, as an increase in employees take advantage of the transit options available through a TDM program, vehicle miles traveled would decrease relative to that under the proposed Project. Therefore, operational impacts to both regional emissions and local concentrations would be less under the Increased Transportation Demand Management Program Alternative than under the proposed Project.

The Increased Transportation Demand Management Program Alternative would involve construction of all proposed Project components, and therefore, would have the same construction-related significant and unavoidable impacts with respect to PM_{10}, VOC, and NO_X emissions. With respect to operations, the Increased Transportation Demand Management Program Alternative would be less than the proposed Project with respect to regional emissions, as well as local concentrations impacts. However, the reduced operational emissions may not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Cultural Resources

Under Alternative 5, all of the proposed Project components would be constructed; therefore, this alternative would include the demolition of existing buildings and introduction of new structures. Implementation of the TDM program under Alternative 5 would not result in different changes to the historic resources compared to the proposed Project. As with the proposed Project, Alternative 5 would not result in the demolition of any individually historic building; however, the demolition of the Administration Building could damage, destroy, or reduce the integrity or significance of the 1961 ATCT. Similar to the proposed Project, mitigation measures would be implemented under Alternative 5 to preserve the character-defining features of the 1961 ATCT in accordance with the Secretary of the Interior's Standards for Rehabilitation. As discussed in Section 4.4, *Cultural Resources*, of the Draft EIR, the proposed Project would have a significant and unavoidable visual impact to the Theme Building as a result of the APM Guideway. Similar to the proposed Project, Alternative 5

would result in the introduction of the same structures that would reduce the level of visual prominence of the Theme Building within the CTA. Similar to the proposed Project, mitigation measures would be implemented under Alternative 5 to guide the preservation and future use of the Theme Building and to ensure that it is visually distinguished from the proposed new construction to maximize its level of visual prominence in the CTA. Development under Alternative 5 would also adhere to the architectural standards established within the LAX Design Guidelines to ensure visual compatibility of proposed Project with the Theme Building. However, the same structures as the proposed Project would be constructed under Alternative 5. Therefore, Alternative 5 would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to historic resources.

Greenhouse Gas Emissions

The GHG emissions from the Increased Transportation Demand Management Program Alternative would be potentially less than those from the proposed Project, since an increased TMD Program should result in fewer vehicle trips into the Airport area. However, GHG impacts from the Increased Transportation Demand Management Program Alternative would likely remain significant and would not avoid or substantially reduce the significant impact that would occur under the proposed Project.

Public Services

The Increased TDM Program Alternative would result in the implementation of all the proposed Project components; however, it would assume a greater participation in the TDM Program. Therefore, the same facilities and infrastructure improvements would be constructed as under the proposed Project. However, similar to the proposed Project, Alternative 5 would not include residential development and would therefore not have a direct impact on student generation or demand for school services. However, under this alternative, LAWA would still require development of the Manchester Square area for the CONRAC. As such, the acquisition of the site currently containing the existing Stella Middle Charter and Bright Star Secondary Charter Academies would still be required, resulting in a significant impact. Similar to the proposed Project, LAWA would implement mitigation to provide moving assistance to these two schools as part of any relocation effort. LAUSD would also be required to complete any required CEQA compliance prior to relocation of the schools to other sites to evaluate and mitigate significant impacts of the school relocation. However, as discussed in Section 4.11.3, *Schools*, of the Draft EIR, the proposed Project may still result in a significant impact as mitigation would be required by a third party. Therefore, Alternative 5 would not avoid or substantially reduce the significant impact that would occur under the proposed Project with respect to schools.

Off-Airport Traffic

The Increased TDM Program Alternative proposes the construction of all proposed Project components; however, it would assume a greater participation in the TDM Program by providing employees and passengers an enhanced set of transportation choices. This Integrated TDM would be powered by a web-based platform that would provide people with an economical mobility option, a positive guest experience, and a reliable and safe way to connect to and from work or air travel. The Integrated TDM alternative would involve the following strategic implementation approaches:

- Phase 1 – LAX and Adjacent Area Employee Mobility Choice Program
- Phase 2 – Passenger Mobility Choice Program

Implementation of the Phase 1 component of Alternative 5 has the potential to reduce between 10 and 12 percent of the daily trips associated with the LAX area employee trips. Reduced daily trips to and from LAX would result in improved operating conditions, particularly at the study intersections located in the path of travel of the employees benefiting from the TDM Program. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, the proposed Project would have a less than significant impact at all intersections with incorporation of mitigation. Incorporating similar measures, Alternative 5 would have similar impacts to the proposed Project with respect to off-Airport traffic. Impacts would be less than significant.

Implementation of the Phase 2 component (Passenger Mobility Choice Element) of Alternative 5 has the potential to reduce the daily trips associated with the LAX area employee and passenger trips by an additional amount beyond the 10 to 12 percent of the LAX area employment trips expected to be reduced by the mitigation measure that would be implemented in Phase 1. Alternative 5 would result in improved operating conditions, particularly at the study intersections located in the path of travel of the employees and passengers benefiting from the TDM Program. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, the proposed Project would have an unavoidable significant impact at one intersection that cannot be mitigated. Alternative 5 would have similar impacts to the proposed Project with respect to off-Airport traffic and would likely result in the same significant unavoidable impact.

Construction Traffic

Construction activities and related construction vehicle trips associated with the Increased TDM Program Alternative would impact on- and off-Airport traffic roadway operations. To the extent that Project-related construction would require temporary lane closures and detours, off-Airport traffic conditions could be impacted. In addition to lane and roadway restrictions, it is anticipated that crosswalks, bike paths, and pedestrian pathways may be restricted or closed for a period of time; alternate routes would be provided. It is anticipated that construction of Alternative 5 would result in the loss of regular vehicular or pedestrian access to some facilities for more than one day and/or result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Project area. Although impacts to traffic during construction would be less than under the proposed Project, impacts would remain significant even with incorporation of mitigation measures.

4.7.2.5.2 LAX Landside Access Modernization Program Potential Future Related Development

Alternative 5, the Increased Transportation Demand Management Program Alternative, would only change the transportation mode of employees accessing the Airport, and therefore would not affect the location, scale, or timing of the potential future related development. Thus, this alternative would have similar impacts for all resource categories when compared to potential future related development as part of the proposed Project. Impacts to air quality, greenhouse gas emissions, off-airport traffic and construction traffic would all be significant.

4.7.2.5.3 Findings

For reasons discussed above, the BOAC hereby rejects the Increased Transportation Demand Management Alternative evaluated in the Draft EIR. Although this alternative would meet all the Project's objectives, BOAC hereby finds that it will not avoid or substantially lessen the significant and unavoidable impacts of the Project related to aesthetics, air quality, cultural resources, greenhouse gas emissions, public services, off-airport traffic, or construction traffic.

4.7.2.6 Alternative 6, Reduced Future Related Development Alternative

The Reduced Potential Future Related Development Alternative, Alternative 6, includes all Project components; however, it provides for less dense potential future related development after completion of construction of the proposed Project in 2035. It is proposed because it would reduce the significant impacts of potential future related development.

The parcels proposed for potential future related development are located adjacent to the CONRAC, ITF East, APM MSF, and ITF West. As with the proposed Project, these parcels would be used for construction laydown and staging areas during construction of the proposed Project, but would be available for future development upon completion of the Project. Development on these parcels would occur sometime beyond 2030 and be completed by independent third-party developers (non-LAWA interests).

While land use designations and design guidelines have been developed to guide future development of these parcels, this Alternative assumes that only half of the potential future related development proposed under the proposed Project would occur (approximately 450,000 sq. ft. total of commercial development rather than the 900,000 sf. ft. total assumed as part of the proposed Project). Alternative 6 assumes approximately 225,000 sq. ft. of commercial development on parcels adjacent to the CONRAC area and approximately 225,000 sq. ft. of commercial development on parcels adjacent to the ITF West and the APM MSF.

As with the proposed Project, Alternative 6 would provide for the opportunity for the following types of commercial space: office space, hotels, restaurants, clothing stores, conference center, theaters, fitness centers, layover facilities, and more. Under the Reduced Potential Future Related Development, all of the proposed Project components would be constructed. Therefore, this alternative would meet all of the proposed Project's objectives.

4.7.2.6.1 LAX Landside Access Modernization Program Project

The Reduced Potential Future Related Development Alternative, Alternative 6, includes construction and operation of all proposed Project components. However, this alternative provides for less dense potential future related development after completion of construction of the proposed Project in 2030. As such, this alternative does not affect construction or operations of any proposed Project component from Phase 1 or Phase 2. Therefore, for LAMP Project components, this alternative would have the same impacts for all resource categories when compared to the proposed Project.

Under the Reduced Potential Future Related Development, all of the proposed Project components would be constructed. Therefore, this alternative would meet all of the proposed Project's objectives.

4.7.2.6.2 LAX Landside Access Modernization Program Potential Future Related Development

Air Quality

Alternative 6 would result in 50 percent less construction of potential future related development than under the proposed Project; therefore, it would have reduced short-term and temporary emissions of criteria air pollutants as compared to the proposed Project. Alternative 6 would result in 50 percent less square footage of potential future related development than under the proposed Project. Therefore, operational emissions under this alternative would be substantially lower than under the proposed Project due to reduced overall square footage. As discussed in Section 4.2.1, *Air Quality*, of the Draft EIR, potential future related development under the proposed Project would result in a significant impact to both regional and localized operation impacts with incorporation of mitigation. As emissions under the proposed Project only slightly exceed thresholds, it is expected that Alternative 6 would reduce operational emissions to a less than significant level. Therefore, this alternative would avoid the significant impact that would occur under the proposed Project with respect to operational emissions.

Greenhouse Gas Emissions

Alternative 6 would result in 50 percent less square footage of potential future related development than under the proposed Project; therefore, GHG emissions under this alternative would be substantially lower than under the proposed Project due to reduced overall square footage. However, the exceedance of the per capita efficiency threshold is greater than 2 times the threshold per year per employee. Although the GHG emissions from the Reduced Potential Future Related Development Alternative would be lower than those under the proposed Project, impacts would remain significant and unavoidable.

Off-Airport Traffic

Under Alternative 6, traffic in the study area would generally be consistent with the proposed Project. Overall, Alternative 6 would significantly impact 9 intersections compared to 11 intersections under the proposed Project, including potential future related development. As discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, the proposed Project would have a significant impact at 1 intersection that cannot be mitigated. Alternative 6 would have similar impacts to the proposed Project with respect to off-Airport traffic. Impacts would be significant and unavoidable.

Construction Traffic

Construction activities and related construction vehicle trips associated with Reduced Potential Future Related Development Alternative would impact on- and off-Airport traffic roadway operations. To the extent that Project-related construction would require temporary lane closures and detours, off-Airport traffic conditions could be impacted. In addition to lane and roadway restrictions, it is anticipated that crosswalks, bike paths, and pedestrian pathways may be restricted or closed for a period of time; alternate routes would be provided. It is anticipated that construction of Reduced Potential Future Related Development Alternative would result

in the loss of regular vehicular or pedestrian access to some facilities for more than one day and/or result in the temporary loss for more than one day of an existing bus stop or rerouting of a bus route that serves the Project area. Although impacts to traffic during construction would be less than under the proposed Project, impacts would remain significant even with incorporation of mitigation measures.

4.7.2.6.3 Findings

For reasons discussed above, the BOAC hereby rejects the Reduced Future Related Development Alternative evaluated in the Draft EIR. Although this alternative would meet all the Project's objectives, BOAC hereby finds that it will not avoid or substantially lessen the significant and unavoidable impacts of the Project related to greenhouse gas emissions, off-airport traffic, or construction traffic.

4.8 Findings on Suggestions Included in Comments on the Draft EIR

Several comments on the Draft EIR suggested additional mitigation measures and/or Project alternatives, or changes to the mitigation measures and alternatives identified in the Draft EIR. The Final EIR incorporates some of these mitigation measures, as explained in the responses to comments included in Chapter 2 of the Final EIR and included in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Final EIR. However, where the suggestions requested minor modifications to already adequate mitigation measures, requested mitigation for impacts that the Draft EIR determined were less than significant, or requested mitigation for impacts for which the Draft EIR already identified measures that would reduce the impact to less than significant, these requests were declined for the reasons explained in the responses to comments included in Chapter 2 of the Final EIR. The BOAC adopts and incorporates by reference the specific reasons for declining such measures contained in the responses to comments in the Final EIR as its grounds for rejecting these measures.

Additionally, certain mitigation measures and/or alternatives suggested in comments would be infeasible. The BOAC finds that specific economic, legal, social, technological, or other considerations make infeasible the following mitigation measures or Project alternatives identified in the Final EIR, for the reasons explained below and in responses to comments in the Final EIR.

4.8.1 SUGGESTED ALTERNATIVES

- Comment LAMP-AL00004-1 on the Draft EIR suggested that LAWA consider "Construction of the New Roadway without taking/using a portion of the [Los Angeles Community College] District Property" located at 9700 S. Sepulveda Boulevard. The "New Roadway" as listed by the commentor refers to the right-turn lane from northbound Sepulveda Boulevard to eastbound W. 96th Street. The commentor suggested that the New Roadway be incorporated into the widening of W. 96th Street or to construct it further north from the District property. For the reasons discussed in Response to Comment LAMP-AL00004-1, the suggestion would not avoid or substantially lessen the significant impacts of the

Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, LAWA would seek design solutions that would not result in having the effect of isolating the WLAC property nor make access to the WLAC property more challenging. Detailed coordination with landowners relative to site access and circulation considerations, both during construction and post-construction, would be conducted at the time of final design of the new roadways and facilities. LAWA would also look at ways to avoid acquisition of the WLAC property during the design process.

- Comment LAMP-AL00008-76 on the Draft EIR suggested that LAWA consider a "constrained growth alternative whereby the proposed Project would accommodate passenger levels up to some number at or below 82.9 MAP, the low end of the range forecast for LAX in the 2040 RTP/SCS." As the commentor notes, the Draft EIR addresses a constrained growth alternative in Section 5.4.1.1.4 of the Draft EIR. For the reasons discussed in Section 4.7.1.6 of these findings and Response to Comment LAMP-AL00008-76, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. As noted in Responses to Comments LAMP-AL00008-2, LAMP-AL00008-4, LAMP-AL00008-7, and LAMP-AL00008-8 and as discussed on page 6-8 in Section 6.3.2 of the Draft EIR, growth in passengers would occur with or without the proposed Project. The proposed Project would not induce more passengers to use LAX because the proposed Project does not include any improvements to core passenger processors (e.g., terminals and gates) or to the airfield facilities. Thus, any alternative to constrain capacity would require steps that would reduce passenger enplanements and aircraft operations from what would occur without the Project, which is beyond LAWA's authority.
- Comments LAMP-PC00005-2 and LAMP-PC00006-1 on the Draft EIR suggested that LAWA consider a "HyperLoop" system instead of an automated people mover (APM). For the reasons discussed in Response to Comment LAMP-PC00005-2, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, the HyperLoop is a proposed method of travel that would transport people at 745 miles per hour between distant locations. Because this technology is theoretical (it has not been constructed anywhere) and the distance between the CTA and the proposed AMC Metro 96th Street Transit Station is less than 3 miles, this system is not a feasible alternative to the proposed Project.
- LAWA received several comments regarding alternative APM alignments within the CTA, including comments LAMP-PC00010-1, LAMP-PC00012-2, LAMP-PC00012-4, LAMP-PC00032-14, and LAMP-PC00032-18. For the reasons discussed in Responses to Comments LAMP-PC00010-1, LAMP-PC00012-2, LAMP-PC00012-4, LAMP-PC00032-14, and LAMP-PC00032-18, the suggestions presented would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, LAWA considered numerous operational characteristics during the planning of the APM system, including turning radii of proposed APM alignments, effect on APM operations and travel times, and traffic and pedestrian circulation, as well as walk distances. Due to the physical constraints of the CTA and the close proximity of the terminals, a spine alignment with three APM stations located approximately equidistant between the north and south terminals best met LAWA's operational criteria for the

system. Section 5.4.1.1 in Chapter 5, Alternatives, of the Draft EIR discusses the various APM alignment alternatives considered and how they were evaluated, and Section 4.7.1 of these Findings presents reasons why many of the APM alignments are infeasible.

- LAWA received several comments regarding improving pedestrian access in the vicinity of Sepulveda Boulevard, including comments LAMP-PC00026-4, LAMP-PC0030-12, LAMP-PC00016-1, and LAMP-PC00022-2. For the reasons discussed in Responses to Comments LAMP-PC00026-4, LAMP-PC0030-12, LAMP-PC00016-1, and LAMP-PC00022-2, the suggestions presented would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible.
- LAWA received several comments regarding suggestions described as alternatives for access into the CTA and the distribution of transportation modes to the various Project elements, including comments LAMP-PC00026-3, LAMP-PC00030-5, LAMP-PC00030-6, LAMP-PC00024-1, LAMP-PC00025-1, LAMP-PC00026-1, LAMP-PC00028-2, LAMP-PC00030-1, LAMP-PC00053-1, LAMP-PC00054-1, LAMP-PC00024-3, LAMP-PC00025-3, LAMP-PC00028-3, LAMP-PC00030-3, LAMP-PC00053-3, LAMP-PC00054-3, and LAMP-PC00031-3. For the reasons discussed in Responses to Comments LAMP-PC00026-3, LAMP-PC00030-5, LAMP-PC00030-6, LAMP-PC00024-1, LAMP-PC00025-1, LAMP-PC00026-1, LAMP-PC00028-2, LAMP-PC00030-1, LAMP-PC00053-1, LAMP-PC00054-1, LAMP-PC00024-3, LAMP-PC00025-3, LAMP-PC00028-3, LAMP-PC00030-3, LAMP-PC00053-3, LAMP-PC00054-3, and LAMP-PC00031-3, the suggestions presented would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make them infeasible. Specifically, these comments are in reference to mode distribution between the CTA and proposed Project elements, which are not necessarily considered alternatives to the proposed Project as a whole. As discussed in responses to several of these comments, LAWA will be evaluating the appropriate actions and incentives to shift traffic to ensure that the investment they are making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways to shift vehicle traffic away from the CTA; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX.
- Comment LAMP-PC00029-6 on the Draft EIR suggested that "the proposed Multi-Use Path be extended along the north side of W. Century Boulevard from Airport Boulevard to S. Sepulveda Boulevard. Alternately, a similar bicycle facility could be made part of 98th Street west of Airport Boulevard…" For the reasons discussed in Response to Comment LAMP-PC00029-6, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, the property on the north side of W. Century Boulevard is not owned by LAWA and there would be no place for a bike path to connect to on the south side of Century Boulevard.

4.8.2 SUGGESTED MITIGATION MEASURES

- Comment LAMP-AR00001-6 on the Draft EIR suggested a modification of Construction-Related Air Quality Mitigation Measure Number 1e under LAX-AQ-1. As discussed in Response to Comment

LAMP-AR00001-6, LAWA generally agrees with the proposed revisions, with some modification. LAWA's existing construction policy includes third-party mitigation monitoring compliance by an on-site monitor who reviews all equipment utilized on LAX construction projects. Because of this existing third-party monitoring, the modification of the revised measure limits annual reviews to equipment brought on site in that year. In response, Table 4.2.1-23 in Section 4.2.1.7 of the Draft EIR has been revised as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of the Draft EIR.

- Comment LAMP-AL00008-64 on the Draft EIR suggested that "the DEIR's measure calling for the use of renewable diesel fuel is vague and directory." As noted in Appendix F, Attachment F.1 Assumptions of the Draft EIR, LAWA is committed to and will require at least 90 percent utilization of renewable diesel fuel by the construction fleet as a part of the LAX Landside Access Modernization Program construction specifications. Therefore, along with the reasons discussed in Response to Comment LAMP-AL00008-64, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible.
- Comment LAMP-AL00008-67 on the Draft EIR suggested that "as mitigation for the Project's significant GHG impacts, LAWA must implement a series of transit-related mitigation measures." For the reasons discussed in Response to Comment LAMP-AL00008-67, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, the commentor presents no evidence that the suggested transit-related mitigation measures are feasible for LAX or would substantially lessen the proposed Project's GHG emission impacts. Further, the comment implies that directly achieving major increases in transit use is a primary objective of the proposed Project, which is incorrect. Furthermore, the comment does not provide any specific mitigation measures it wishes LAWA to implement, but mainly cites international airports which operate under different regulations and funding structures.
- Comment LAMP-AL00008-68 on the Draft EIR suggested that "LAWA should also mitigate for the Project's significant climate change impacts by committing to lobby the major airlines to participate in the Aviation Plan recently approved by the International Civil Aviation Organization." For the reasons discussed in Response to Comment LAMP-AL00008-68, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, the Aviation Plan is voluntary; thus emissions reductions from the Aviation Plan are not sufficiently quantifiable, verifiable, or enforceable to rely upon as CEQA mitigation at this time.
- Comment LAMP-AL00008-69 on the Draft EIR suggested that "There are additional guidance documents that provide a full suite of GHG mitigation measures. LAWA must review and consider all of the measures listed in these documents in its revised DEIR, and it must adopt all feasible measures in order to reduce the Project's impacts to a level below significance, or as much as feasible." Response to Comment LAMP-AL00008-69 lists measures identified in the four GHG guidance documents listed by the comment, and analyzes their feasibility for the proposed LAX Landside Access Modernization Program Project. The Response demonstrates that, for those measures that are

applicable to the proposed Project and potentially feasible, such measures are already 1) included as part of Standard Control Measures (Mitigation Measures) LAX-AQ-1, LAX-AQ-2 or LAX-AQ-3; 2) included as part of project-specific mitigation measures MM-GHG (LAMP)-1 and MM-AQ (LAMP)-1; 3) included as part of the LAX Design Guidelines Sustainability Measures (Table 4.5-16 of the Draft EIR); 4) are part of the proposed Project description/components; or 5) already required by law. As such, all feasible measures to reduce GHG emissions associated with the proposed Project have already been identified in Section 4.5.7 of the Draft EIR. As discussed in Response to Comment LAMP-AL00008-69, specific economic, legal, social, technological, or other considerations make the remaining mitigation measures infeasible. Specifically, all feasible measures to reduce GHG emissions associated with the proposed Project have already been identified in Section 4.5.7 of the Draft EIR.

- Comment LAMP-PC00029-12 on the Draft EIR suggested that "[a]n additional noise mitigation should be introduced requiring periodic noise monitoring in high construction activity locations and high construction traffic locations for both Phases I and II to determine whether additional noise mitigations might be necessary." As discussed in Response to Comment LAMP-PC00029-12, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, although construction equipment noise impacts would, in general, be significant, implementation of Standard Control Measure (Mitigation Measure) LAX-N-1 and Mitigation Measure MM-N (LAMP)-1 would reduce these impacts to levels less than significant. Therefore, no additional construction noise mitigation measures are necessary.
- Comment LAMP-PC00030-16 suggested that "the mitigation measure related to law enforcement, requiring only new lighting, cameras, call boxes and fencing, is not adequate to address the exponential increase in people, vehicular traffic and over 10 million square feet of new development under the LAMP improvements (CONRAC, ITF East, ITF West, Maintenance Facilities, APM and its stations)." As discussed in Response to Comment LAMP-PC00030-16, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, as discussed in Section 4.11.2.5 of the Draft EIR, operation of the proposed Project would have a less than significant impact on law enforcement services. Therefore, no operational mitigation measures such as those suggested by the commentor would be required.
- Comment LAMP-PC00030-17 suggested that "the Final EIR reflect the inclusion of a mitigation measure which adds specially-trained fire personnel, equipment and possibly an expanded fire station facility within Gateway's border to mitigate possible impacts under the LAMP improvements." As discussed in Response to Comment LAMP-PC00030-17, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, as discussed in Section 4.11.1.5 of the Draft EIR, operation of the proposed Project would have a less than significant impact on fire protection and emergency services, and no operational mitigation measures such as those suggested by the commentor would be required.

- Comment LAMP-AL00004-17 states that "The DEIR cites school relocation as a mitigation measure. This measure should also be considered in relation to the District Property, as it is an active educational facility and the New Road planned on a portion of it and its related improvements may be disruptive to outdoor and indoor instruction." As discussed in Response to Comment LAMP-AL00004-17, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, unlike the two schools referenced in Mitigation Measure MM-PS (LAMP)-1, implementation of the proposed Project would not require acquisition of the WLAC site or relocation of the subject facility, or result in the need for new or physically altered school facilities. Neither the Draft EIR nor commentor identify any impacts that would affect the ability of WLAC to maintain an acceptable instructional and training environment; any potential impact on WLAC's ability to maintain an acceptable instructional and training environment and maintain performance objectives is speculative and would not be considered an impact on the physical environment under CEQA. Recognition of the subject property as used for educational as well as commercial uses does not result in any new or substantially more severe significant environmental impacts compared to those disclosed in the Draft EIR, or require the development of any additional mitigation measures.
- Comments LAMP-AL00002-7, LAMP-PC00021-15, and LAMP-PC00031-15 suggested that "There are a "substantial" number of people who are being impacted by this project and this should require that LAWA participate financially in the construction of transitional and replacement housing." As discussed in Responses to Comments LAMP-AL00002-7, LAMP-PC00021-15, and LAMP-PC00031-15, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, the housing and associated population being displaced by the proposed Project are located in areas that have been part of the Los Angeles World Airports Relocation Plan: Manchester Square and the Belford Area also known as the Aircraft Noise Mitigation Plan (ANMP) for the Belford and Manchester Square areas, since 2000. As of June 2016, all but 38 residential parcels between the Belford and Manchester Square areas have been acquired through this voluntary acquisition program. The homeless population that would be displaced by the proposed Project would be accounted for through Los Angeles Homeless Services Authority's annual homeless count. Implementation of the proposed Project would not interfere with the ability for the County and City to combat homelessness and provide appropriate mechanisms for homeless individuals seeking available services.
- Comment LAMP-AL00006-7 suggested that "The Project should include ITS improvements, such as Adaptive Traffic Control Systems (ATCS) and Bus Signal Priority (BSP), Closed-circuit Television (CCTV), and Changeable Message Signs (CMS), along the Sepulveda Boulevard and Jefferson Boulevard corridors to work closely in conjunction with the freeway corridor ITS systems and provide coordinated and improved regional and sub-regional access to the Los Angeles International Airport (LAX) and its associated facilities." As discussed in Response to Comment LAMP-AL00006-7, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, the proposed Project would not cause significant traffic impacts at any of the

City of Culver City intersection locations and therefore would not require any mitigation measures under CEQA.

- Comment LAMP-AL00010-3 suggested that "the identified traffic mitigation measures in the City of Inglewood should be implemented prior to commencement of construction of the Project." As discussed in Response to Comment LAMP-AL00010-3, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, this recommendation is infeasible as numerous components of these measures by their very nature must occur during construction. Among other things, these measures include provisions for detours, limitations on roadway closures, construction management plans, including signage, noticing, flaggers, sequencing limits, and requirements to comply with the California Manual on Uniform Traffic Control Devices (MUTCD). As part of these MUTCD requirements, there are provisions for coordination with local emergency services, temporary lane separators that have sloping sides to facilitate crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. MUTCD requirements also provide for construction work during off-peak hours and flaggers. These requirements also include provisions for "Detour for Bike Lane on Roads with Closure of One Travel Direction." While these measures call for consultation and planning prior to initiation of various construction activities, these measures are substantively designed to be implemented during construction.
- Comment LAMP-PC00031-5 suggested that "the final EIR should include mitigation measures to discourage daily rail commuters from parking at the CONRAC or ITF in order to avoid an adverse impact on the availability of parking spaces for LAX customers." As discussed in Response to Comment LAMP-PC00031-5, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, the Consolidated Rental Car Facility (CONRAC) and Intermodal Transportation Facility (ITF) East would be Airport facilities dedicated to the sole use of Airport passengers and employees.
- Comment LAMP-PC00031-6 suggested that "LAWA should develop a mitigation plan for pedestrians for that street [Sepulveda Boulevard], with improvements in sidewalks, crosswalks and lighting." As discussed in Response to Comment LAMP-PC00031-6, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, Appendix B, LAX Design Guidelines, of the Draft EIR contains LAWA's comprehensive vision for the passenger experience at LAX. The overall purpose of the Design Guidelines is to provide a framework to enhance the visual quality of the environment in and around LAX in a way that is consistent with airport needs and existing area conditions. The Design Guidelines encourage the development of more sustainable and user friendly spaces with a focus on unified, high quality architecture and urban design, and a seamless interaction between a variety of users such as pedestrians, cyclists, transit riders, and automobile drivers with an emphasis on the passenger experience. No further mitigation would be required.

- Comment LAMP-PC00031-9 suggested "that the DEIR implement staggered traffic lights and other mitigation measures on [Aviation and Century Boulevards]." As discussed in Response to Comment LAMP-PC00031-9, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, with incorporation of mitigation as discussed in Section 4.12.2, *Off-Airport Transportation*, of the Draft EIR, no significant impacts would occur along Aviation or Century Boulevards.
- Comment LAMP-PC00028-1, and similar Comments LAMP-PC00031-14 and LAMP-AL00008-80, suggested that "Imperial Highway and Aviation Blvd will serve as a primary construction haul routes for this, as well as other projects that are taking place at LAX. Funding needs to be identified to properly improve and maintain these important roadways during and after construction is complete." As discussed in Response to Comment LAMP-PC00028-1, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, LAWA will work with the agencies responsible for the funding of this improvement and maintenance of these roadways to identify any issues during construction with the condition of the haul routes.
- Comment LAMP-AL00008-40 suggested that "LAWA's Chief Executive Officer should establish a single point of responsibility for day-to-day landside operations (terminal, traffic, and parking)." As discussed in Response to Comment LAMP- AL00008-40, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, LAWA will have sufficient organizational and staffing to successfully implement the LAX Landside Access Modernization Program EIR construction traffic mitigation measures. Proposed Project procurements would provide contractual mechanisms to require that these mitigation measures be successfully implemented and enforced. Whether LAWA appoints a single point of responsibility for day-to-day landside operations has no bearing on the environmental effects of the proposed Project or the effectiveness of construction traffic mitigation measures.
- Comment LAMP-AL00008-41 suggested that "LAWA should form a joint-services team that includes Operations, Maintenance, & Emergency Management Group; Law Enforcement & Homeland Security; Traffic, Airports Development Group, and Commercial Development Group." As discussed in Response to Comment LAMP- AL00008-41, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, these concepts have already been incorporated into the proposed mitigation measures.
- Comment LAMP-AL00008-42 suggested that "LAWA should increase landside operations staffing levels." As discussed in Response to Comment LAMP-AL00008-42, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, LAWA will have sufficient organizational and staffing to successfully implement the LAX Landside Access Modernization Program EIR construction traffic mitigation measures. Proposed Project procurements would provide

contractual mechanisms to require that these mitigation measures be successfully implemented and enforced. Whether LAWA increases landside operations staffing has no bearing on the environmental effects of the proposed Project or the effectiveness of construction traffic mitigation measures.

- Comment LAMP-AL00008-43 suggested that "LAWA should assign overall APM construction impact coordination on the landside to a single position." As discussed in Response to Comment LAMP-AL00008-43, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, these concepts have already been incorporated into the proposed mitigation measures.
- Comment LAMP-AL00008-44 suggested that "LAWA should include in its contract provisions with APM planning, construction, and operations contractor(s) that they: have significant incentives for maintaining CTA capacity and substantial penalties for reducing it; and provide coordination staffing and performance requirements in APM construction contracts." As discussed in Response to Comment LAMP- AL00008-44, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, LAWA would establish a Project Task Force specific to the LAX Landside Access Modernization Program which could be comprised of key stakeholders from LAWA, the Coordination and Logistics Management Team (CALM), other City departments, and others as deemed appropriate as outlined in proposed mitigation measure MM-ST (LAMP)-1. Contractors working within the CTA would be required to adhere to these procedures so that access to the CTA for passengers is maintained at all times, with minimal disruption. Any work to be done within City streets must follow enforceable City provisions for performing work within the public right-of-way. Contracts with private entities responsible for construction will contain provisions to enforce the construction-related mitigation procedures, including penalties for noncompliance.
- Comment LAMP-AL00008-45 suggested that "LAWA should conduct periodic reviews of the construction process to learn from successes and failures, with the understanding that it may well be in order to change approaches if existing arrangements prove unworkable or ineffective." As discussed in Response to Comment LAMP-AL00008-45, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, as indicated in Section 4.12.3, *Construction Surface Transportation*, of the Draft EIR, LAWA would establish a Project Task Force (Mitigation Measure MM-ST (LAMP)-1), specific to the LAX Landside Access Modernization Program. The Project Task Force would meet weekly to discuss issues that have arisen and plan for upcoming construction activities. Thus, weekly reviews of construction issues will be conducted and steps taken to ensure that any issues are addressed as quickly as possible. The process is structured to continuously collect, share and implement lessons learned from construction of the LAX Landside Access Modernization Program elements. Furthermore, these measures will be subject to the Mitigation Monitoring and Reporting Program prepared pursuant to State CEQA Guidelines Section 15097.
- Comment LAMP-AL00008-46 suggested that "LAWA should also establish or obtain traffic engineering capability." As discussed in Response to Comment LAMP- AL00008-46, the suggestion

would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, LAWA and construction contractors will have sufficient traffic engineering expertise to successfully implement the LAX Landside Access Modernization Program EIR construction traffic mitigation measures. Whether LAWA engages additional traffic engineering expertise has no bearing on the environmental effects of the proposed Project or the effectiveness of construction traffic mitigation measures.

- Comment LAMP-AL00008-47, and a similar Comment LAMP-AL00008-48, suggested that "LAWA should train airport contract workers regarding Guest Experience initiatives, including wayfinding during construction." As discussed in Response to Comment LAMP-AL00008-47, the suggestion would not avoid or substantially lessen the significant impacts of the Project, and specific economic, legal, social, technological, or other considerations make it infeasible. Specifically, as indicated in Section 4.12.3, *Construction Surface Transportation*, of the Draft EIR, LAWA would establish a Project Task Force (Mitigation Measure MM-ST (LAMP)-1) specific to the LAX Landside Access Modernization Program. The Project Task Force would develop a comprehensive and long-term communication and construction impact outreach strategy for implementation during construction, including Airport contract workers. The Task Force would work closely with other LAWA departments, including Public Relations, Planning and Development, and Operations. The Task Force would also ensure that an innovative and effective construction outreach and communication strategy is developed to keep key stakeholders, businesses, and residents notified and informed during construction of the proposed Project.

4.9 Findings on Responses to Comments on the Draft EIR and Revisions Made in 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 amount to significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect that LAWA has declined to implement. Therefore, the BOAC finds that recirculation of the LAX Landside Access Modernization Program EIR is not required pursuant to State CEQA Guidelines §15088.5(b).

4.10 Location and Custodian of Records

The documents and other materials that constitute the administrative record for LAWA's actions related to the LAX Landside Access Modernization Program are located at LAWA, One World Way, 2nd Floor, Los Angeles, CA 90045. The LAWA Environmental, Land Use and Planning Division is the custodian of the administrative record for the Project.

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