

October 2019 |

Los Angeles International Airport

Proposed Negative Declaration and Initial Study for the Terminal 4 Modernization Project

Prepared for:

Los Angeles World Airports

Prepared by:

RICONDO

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NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION

Pursuant to the State of California Public Resources Code Article 6 of the California Environmental Quality Act (CEQA), as amended, the City of Los Angeles, through Los Angeles World Airports, has prepared an Initial Study for the project described below. Under CEQA, the City identified no significant impacts on the environment and proposes to adopt a Negative Declaration.

Date: October 24, 2019

To: All Interested Parties

Project Title: Los Angeles International Airport (LAX) Terminal 4 Modernization Project

Project Location: The project site (generally LAX Terminal 4 and associated apron area) is located within the Central Terminal Area (CTA) of LAX, between Terminal 5 (east) and Tom Bradley International Terminal (west). LAX is situated within the City of Los Angeles, an incorporated city within Los Angeles County. The project site is in the southern portion of the CTA, west of Sepulveda Boulevard, south of World Way, east of the Tom Bradley International Terminal and north of the South Airfield Complex. Related construction staging activities would occur elsewhere on other Airport property.

Lead Agency: Los Angeles World Airports (LAWA)

Description of Project:

The Terminal 4 Modernization Project (proposed project) includes the modernization of the existing Terminal 4 (T4) in order to meet seismic and structural safety standards. The modernization of T4 would improve operational efficiency, passenger level of service, and amenities within the terminal, as well as modernize the interior and exterior of the terminal. The proposed project includes reconfiguring existing passenger gate positions; upgrading the T4 Concourse; interior improvements to the T4 West Ticketing Building; realignment of Taxiway C9; upgrades to T4 utilities and operational systems; and the reconstruction and realignment of the T4 aircraft parking apron. In total, approximately 258,000 square feet of new building space would be added to T4. The proposed improvements would provide appropriately sized holdrooms, expanded concessions areas, updated restrooms, and improved passenger circulation. The proposed project would not increase the number of aircraft contact gates (15) at T4 or change the number or type of aircraft operations at T4.

Public Review and Comment:

The proposed Negative Declaration and Initial Study for the proposed project will be available for a 20-day review period beginning on October 24, 2019, accessible online at www.lawa.org/en/lawa-our-lax, under "Environmental Documents, Documents Underway," and in print at the following locations:

LAWA Administrative Offices
6053 Century Blvd., Suite 1050
Los Angeles, CA 90045

Playa Vista Public Branch Library
6400 Playa Vista Drive
Los Angeles, CA 90094

El Segundo Library
111 W. Mariposa Avenue
El Segundo, CA 90245

Westchester-Loyola Village Branch Library
7114 W. Manchester Avenue
Los Angeles, CA 90045

Written comments must be submitted by no later than 5:00 p.m. Pacific Daylight Time on Wednesday, November 13, 2019, on the LAX website (www.lawa.org/en/lawa-our-lax, under “Submit a Comment”) or by mail to:

Los Angeles World Airports
Environmental Planning Division
Attention: Brenda Martinez-Sidhom, Airport Planner
P.O. Box 92216
Los Angeles, CA 90009-2216

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INITIAL STUDY CHECKLIST

LEAD AGENCY Los Angeles World Airport (LAWA)	COUNCIL DISTRICT Council District 11	DATE
RESPONSIBLE AGENCIES: City of Los Angeles		
PROJECT TITLE/NO. Los Angeles International Airport (LAX) Terminal 4 Modernization Project		CASE NO.
BRIEF PROJECT DESCRIPTION: The proposed Terminal 4 (T4) Modernization Project (Proposed Project) would partially demolish and renovate the T4 Concourse, renovate the interior of the West Ticketing Building, realign Taxilane C9, and reconstruct the apron surrounding the T4 Concourse to improve passenger level of service, accommodate modern aircraft fleets and operational support equipment, and provide seismic resiliency and structural safety in accordance with the California Building Standards Code and American Society of Civil Engineers (ASCE) standards. Components of the Proposed Project include: 1) demolition of the unsalvageable portions of T4 (the original 1961 satellite and 1969 satellite extension), and a portion of the Connector Building (the narrow building that connects the original 1961 Satellite building to the linear Terminal building along World Way); 2) reinforcement of the remaining portion of the Connector Building to include seismic upgrades to meet current building code requirements; 3) expansion of the former Satellite and Satellite Extension, and Connector buildings by a total of 217,000 square feet including the Federal Inspection Service corridor, modernization and expansion of baggage make up areas, new consolidated bus gate with holdroom, replacement of existing concourse facilities; and 4) demolition and repavement of the existing aircraft parking apron, realignment of aircraft parking positions including underground aircraft fuel hydrants, upgrade to aircraft service utilities – including 400 Hz ground power units, preconditioned air units, and potable water cabinets.		
ENVIRONMENTAL SETTING: The project site is completely developed with airfield apron and taxilane pavement and terminal buildings. Surrounding uses include terminal buildings, aircraft apron and taxilanes, terminal roadways, and parking garages.		
PROJECT LOCATION: The Proposed Project is located within the existing T4 facility and apron area in the Central Terminal Area (CTA) of LAX. Terminal 5 sits adjacent to T4 to the east and the Tom Bradley International Terminal (TBIT) to the west, while the site is bordered to the south by the airfield and to the north by Parking Garage 4 and World Way.		
PLANNING DISTRICT Los Angeles International Airport Specific Plan	STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED December 14, 2004, as amended in 2013, 2016, and September 8, 2017	
EXISTING ZONING LAX - A Zone: Airport Airside Sub-Area	<input checked="" type="checkbox"/> DOES CONFORM TO PLAN <input type="checkbox"/> DOES NOT CONFORM TO PLAN <input type="checkbox"/> NO DISTRICT PLAN	
PLANNED LAND USE & ZONE Airport related airside uses		
SURROUNDING LAND USES North – Airport Uses; East – Airport Uses; South – Airport Uses; West – Airport Uses		
TRIBAL CONSULTATION: In accordance with Public Resource Code §21080.3.1, LAWA transmitted a letter of notification and coordination to the San Gabriel Band of Mission Indians in response to a standing request that the tribe be informed of excavation activities at the LAX. LAWA would comply with Assembly Bill 52 requirements for consultation, confidentiality, and mitigation during and following the Proposed Project as necessary.		

SUMMARY AND DETERMINATION

DETERMINATION (To be completed by Lead Agency)	
On the basis of this initial evaluation:	
<input checked="" type="checkbox"/> I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
<input type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
<input type="checkbox"/> I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
<input type="checkbox"/> I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
<input type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
SIGNATURE	TITLE

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry Resources	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards & Hazardous Materials
<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population/Housing	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	Mandatory Findings of Significance

INITIAL STUDY CHECKLIST	
PROPONENT NAME Los Angeles World Airports	PHONE NUMBER (855) 463-5252
PROPONENT ADDRESS – Street Address Los Angeles World Airports 6053 W. Century Blvd. Suite 1050 Los Angeles, California 90045	Mailing Address P.O. Box 92216 Los Angeles California, 90009-2216
PROPOSAL NAME Los Angeles International Airport – Terminal 4 Modernization Project	DATE SUBMITTED

1. INTRODUCTION

This Initial Study has been prepared by Los Angeles World Airports (LAWA), acting in its capacity as the lead agency under the California Environmental Quality Act (CEQA), to determine whether the construction and implementation of the Terminal 4 (T4) Modernization Project (the Proposed Project) at Los Angeles International Airport (LAX or the Airport) may result in a significant effect on the environment, pursuant to the CEQA Statute and Guidelines.^{1,2} LAWA intends for this Initial Study to satisfy the content requirements of CEQA Guidelines Section 15063, subdivision (d)(1)-(6). Based on the analysis contained in this Initial Study, LAWA has determined that construction and operation of the Proposed Project would not result in any significant impacts.

¹ California Public Resources Code §21000 et seq.

² California Code of Regulations, Title 14, §15000 et seq.

Project Title

Los Angeles International Airport – Terminal 4 Modernization Project

Lead Agency Name and Address

Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

Contact Person and Phone Number

Brenda Martinez-Sidhom
Airport Planner
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216
(855) 463-5252

Project Location

LAX and the surrounding area, Los Angeles County, California

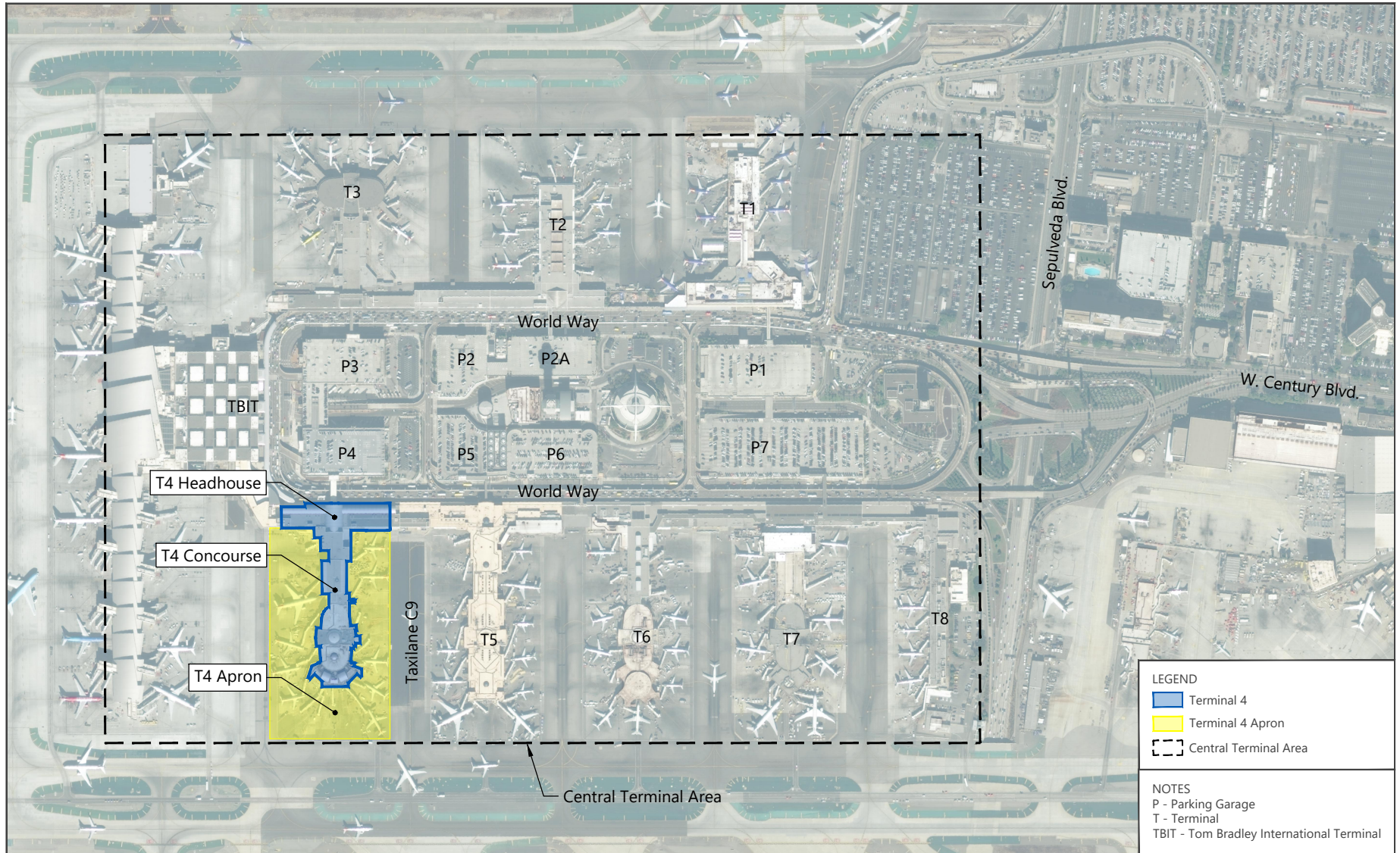
Project Sponsor Name and Address

Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

Project Area

The Project area is within the LAX property boundary, at the T4 Concourse building, the West Ticketing portion of the T4 Headhouse, and the T4 airfield apron between the Tom Bradley International Terminal (TBIT), to the west, and Terminal 5 to the east, as depicted on **Exhibit 1-1**.

The state, regional, and local land use plans, policies, and regulations relevant to the project site and surrounding area are listed and discussed in Section 3.2.



SOURCE: ESRI Basemap, Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, November, 2016 (aerial image); Ricondo, July 2019 (project location).

EXHIBIT 1-1



PROJECT LOCATION

Drawing: P:\Project-Chicago\LA\WALAX T4 Improvements\6. AutoCAD\Project Description Exhibits_20191014.dwg Layout: 01-Proposed Project Location Plotted: Oct 14, 2019, 10:14AM

2. PROJECT DESCRIPTION

2.1 INTRODUCTION

The City of Los Angeles, through LAWA in its capacity as owner and operator of Los Angeles International Airport (LAX or the Airport), proposes the modernization of T4 at LAX. The proposed T4 Modernization Project (Proposed Project) entails interior and exterior enhancements to the existing T4 Concourse; improvements to the T4 apron; realignment of Taxilane C9; interior enhancements to the West Ticketing Building within the T4 Headhouse (West Ticketing Building); and improvements to the T4 utilities and operational support systems (i.e., baggage handling system, aircraft resupply systems, etc.). The Proposed Project would demolish, replace, and/or renovate portions of the T4 Concourse building; renovate the interior of the West Ticketing Building; realign Taxilane C9; and reconstruct the aircraft parking apron surrounding the T4 Concourse (see **Exhibit 2-1**) to improve passenger level of service, accommodate modern aircraft fleets and operational support equipment, and provide seismic resiliency and structural safety in accordance with the California Building Standards Code and American Society of Civil Engineers (ASCE) standards. The Proposed Project would not increase the existing number of aircraft contact gates (15) at T4 or otherwise result in a change in aircraft operations. The aircraft parking positions would be realigned to provide greater operational flexibility.

T4 was originally opened in 1961 as a Satellite terminal building and a separate Headhouse; however, the terminal has undergone several alterations and additions. The T4 Concourse now comprises the T4 Headhouse, which is organized into Central, East, and West Ticketing Buildings; the Connector building; the Satellite; and the Satellite Extension (see **Exhibit 2-2**). The Connector building, which connects the Headhouse to the Satellite, opened in 1983 and was renovated in 2001. The T4 Satellite includes the Satellite Extension, which opened in 1969 and was subsequently renovated in 1999. The substructures within the Connector building, the Satellite, and the Satellite Extension are all seismically deficient and require replacement or renovation to comply with ASCE and California Building Standards Code.

The Proposed Project would include demolition of the Satellite and Satellite Extension portions of the T4 Concourse and reinforcement of the Connector, via building expansion and structural upgrade. The proposed new construction and structural supporting elements would increase the square footage of the T4 Concourse. The existing T4 Concourse building envelope would be expanded to accommodate enhancements to the building (see Exhibit 2-2). The Connector would be partially demolished and seismically upgraded to meet modern building code requirements. The realigned Concourse would accommodate improved internal and apron-area operations and support an improved passenger experience by providing appropriately sized holdrooms (i.e., passenger waiting areas), increased concessions offerings, and public restrooms sized and allocated throughout the building in a manner consistent with Airport Cooperative Research Program (ACRP) and International Air Transport Association (IATA) guidelines.

In total, the T4 Concourse would increase by approximately 258,000 square feet, resulting in a total area of approximately 723,735 square feet. A description of the existing and proposed floor areas of each level of the T4 Concourse are provided below and summarized in **Table 2-1**.

TABLE 2-1: TERMINAL 4 MODERNIZATION PROJECT, EXISTING AND PROPOSED FLOOR AREAS (SQUARE FEET)

TERMINAL 4	EXISTING AREA	EXISTING AREA NO CHANGE	EXISTING AREA RENOVATION	EXISTING AREA REBUILD	PROPOSED NEW AREA	TOTAL AREA
Arrivals Level	90,130	81,030	9,100	-	20,000	110,130
Ramp/Apron Level	140,220	-	74,860	65,360	51,000	191,220
Concourse Level	134,775	-	67,355	67,420	56,000	190,775
Club Level	98,230	-	62,055	36,175	90,000	188,230
Roof Level	2,830	2,830	-	-	41,000	43,380
Total	466,185	83,410	213,370	168,955	258,000	723,735

SOURCE: PGAL, 2019.

2.2 PROJECT CHARACTERISTICS

The following subsections provide details of the Proposed Project by building level.

2.2.1 ARRIVALS LEVEL

Existing Conditions

The T4 Arrivals level is the lowest level of the T4 Concourse (see **Exhibit 2-3**). The primary purpose of the Arrivals level is to provide subterranean tunnel access for airside passenger and employee circulation between:

- T4 and T5 Concourses for connecting and transfer passengers
- T4 Concourse and Baggage Claim
- T4 International Arrivals and T4 Federal Inspection Services (FIS)

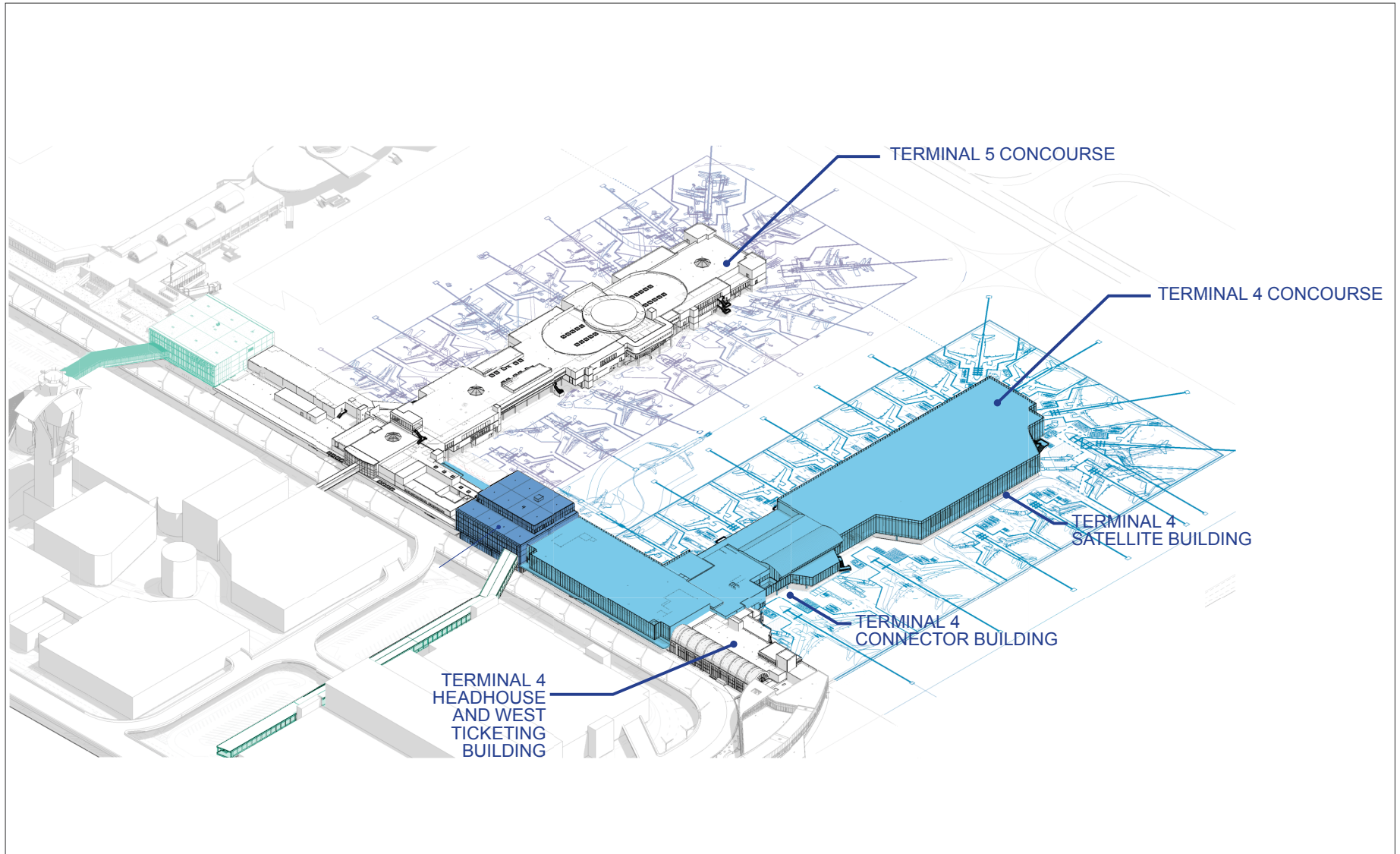
In addition to subterranean tunnels, the Arrivals level contains small operational support spaces. The two northernmost gates on the west side of the T4 Concourse are connected, via a sterile corridor, to the FIS within the T4 Headhouse, through which all arriving international passengers are processed.

Proposed Improvements

The Proposed Project would replace the existing secure vertical circulation, extend the existing FIS corridor southward to increase operational flexibility by allowing all west side gates (6 of the 15 total T4 gates) to accommodate international arrivals, and construct additional Arrivals level support space to accommodate upgraded building systems and operational support functions. Existing building utilities would also be updated.

2.2.2 RAMP/APRON LEVEL

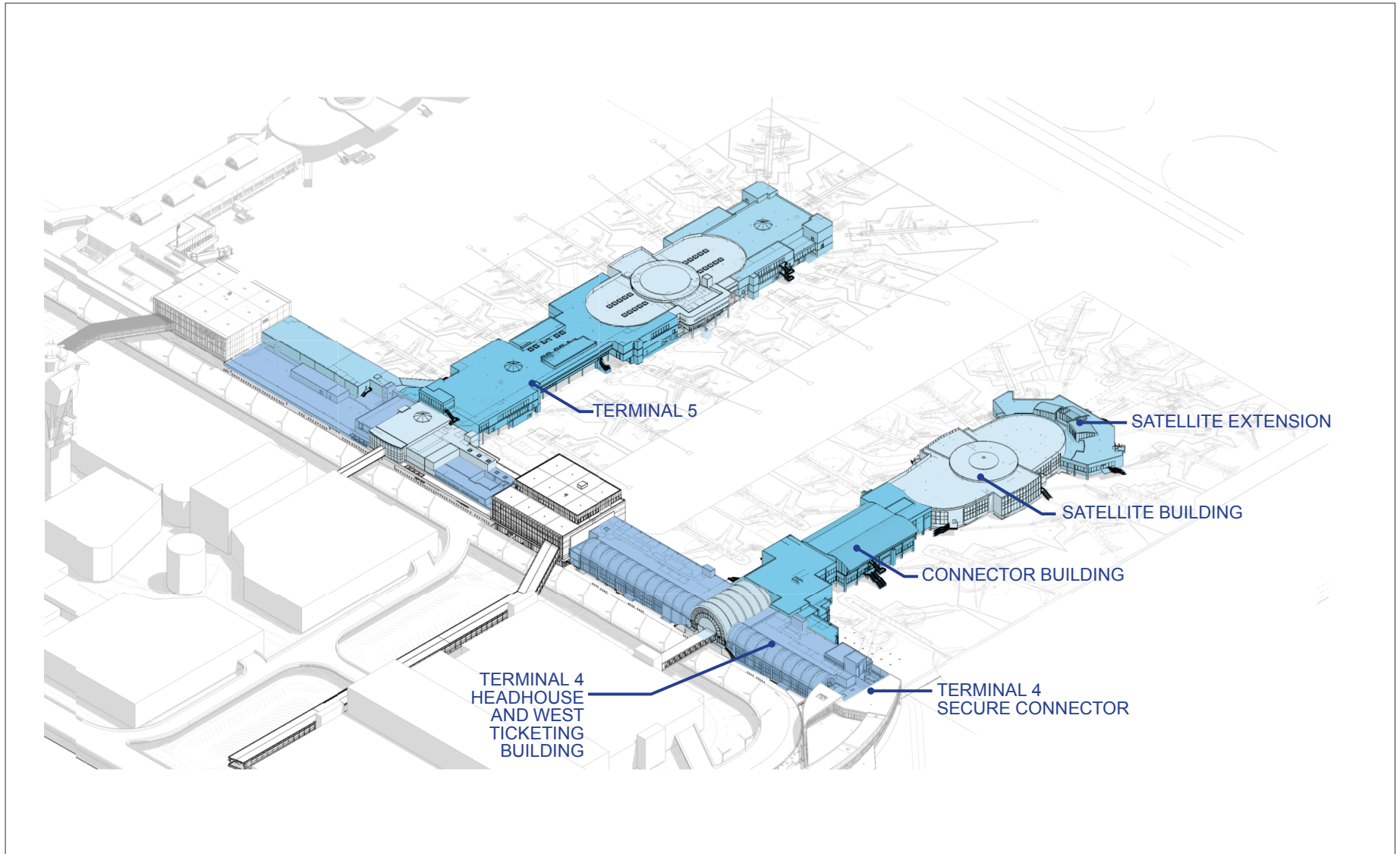
The T4 Ramp and Apron Level (Ramp level) comprises an interior and exterior component. The aircraft parking apron, the pavement external to the T4 Concourse building envelope, provides an area for aircraft refueling, resupply, and light maintenance activities. The area internal to the T4 Concourse building



SOURCE: PGAL, May 2019.

EXHIBIT 2-1
PROPOSED PROJECT

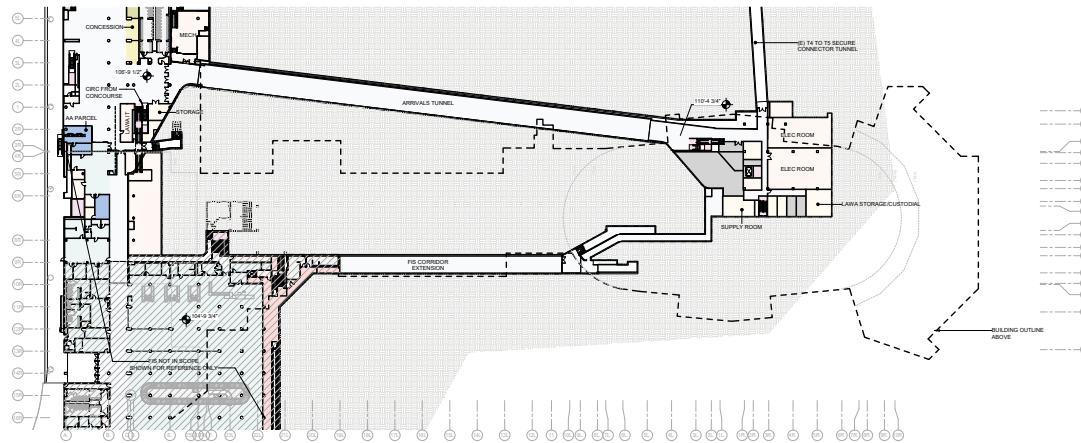
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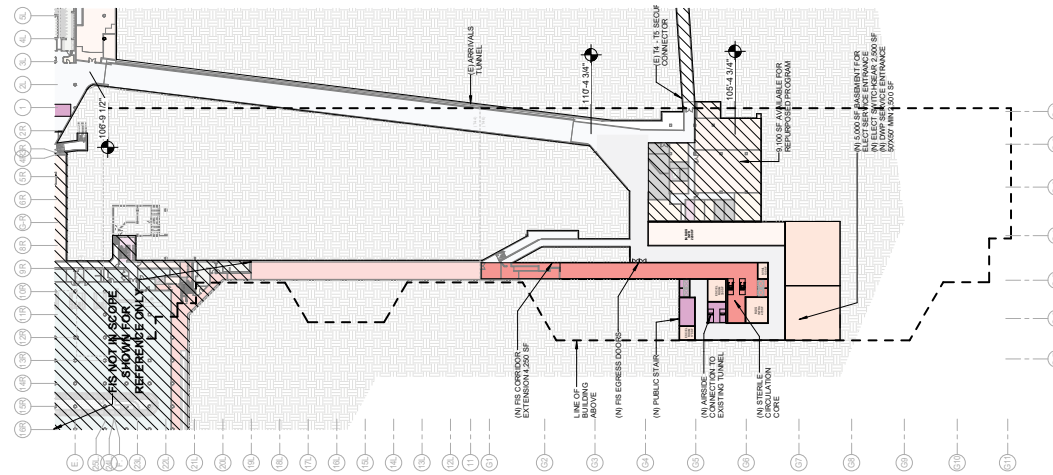
SOURCE: PGAL, May 2019.

EXHIBIT 2-2
EXISTING PROJECT AREA

0 Not to Scale



EXISTING



PROPOSED DEVELOPMENT

SOURCE: PGAL, May 2019.

0 Not to Scale

EXHIBIT 2-3
ARRIVALS LEVEL

envelope, the Ramp area, is comprised of the T4 baggage handling system (BHS) and office and support space for vendor, air carrier, and LAWA operations (see **Exhibit 2-4A**). Beyond the aircraft parking apron are taxilanes for aircraft to taxi between the apron and the active taxiways and runways. The T4 Ramp level also includes a bus gate to shuttle passengers between the T4 Concourse and the American Eagle Commuter Terminal and remote aircraft parking positions. The following provides a description of the existing conditions and proposed improvements at the Ramp level by sub-area.

2.2.2.1 AIRPORT APRON

Existing Conditions

The apron extends from the T4 Concourse building envelope to the aircraft parking limit line (see **Exhibit 2-4B**). The apron provides aircraft parking positions for passenger, baggage, and cargo loading and unloading to and from stationary aircraft. Aircraft resupply and minor aircraft maintenance are also completed on the apron. The aircraft parking apron also accommodates storage and movement of ground support equipment (GSE) that serve gated aircraft including baggage tractors, belt loaders, and aircraft tugs. There are currently 15 aircraft parking positions within the T4 apron; however, the arrangement of the aircraft parking, and the associated passenger boarding bridges (PBB), does not efficiently accommodate the current aircraft fleet mix utilized at the terminal. The space allocated to air carrier, tenant, and LAWA airfield support functions on the Ramp level needs to be upgraded.

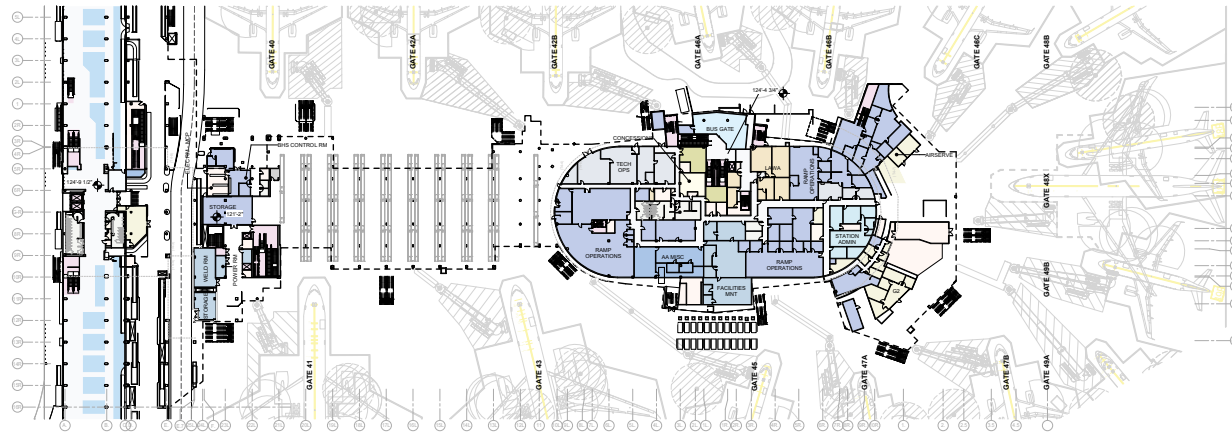
Beyond the aircraft parking limit line are a series of taxilanes that accommodate aircraft movement between parking positions and the Airport's taxiways and runways, including Taxilane C9, to the east of T4, and Taxilane C10 to the west. Use of Taxilane C9 is currently restricted to airplane design group (ADG) III or smaller aircraft. Per FAA Advisory Circular 150/5300-13A, Taxilane C9 is currently too narrow to permit use by ADG-IV aircraft but is wider than necessary to accommodate the ADG-III aircraft that currently use it. The aircraft parking limit line on the west side of T4, which lies adjacent to Taxilane C10, includes a deviation, or cut-in, at the southern terminus that allows ADG VI aircraft to access Gate 159 at TBIT, on the opposite side of Taxilane C10. The apron cut-in consequently reduces the space available for T4 apron activities, including aircraft parking, at the southwest corner of the T4 apron. Additionally, due to years of continual and intense use, the T4 apron pavement has reached the end of its serviceable life and requires replacement.

Proposed Improvements

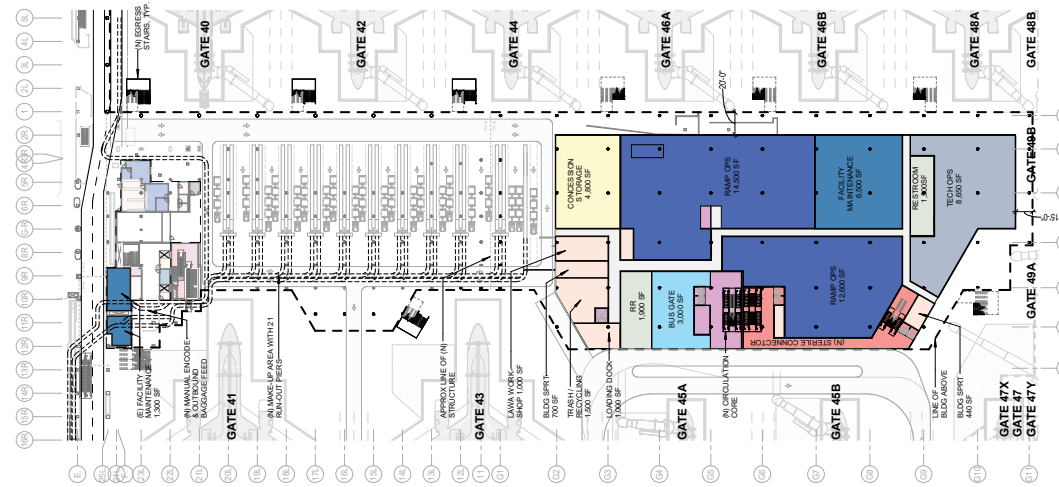
The existing aircraft apron, comprised of 15 aircraft parking positions and associated PBB, would be demolished and repaved in phases; the aircraft parking positions would be realigned to provide operational efficiency and flexibility to accommodate American Airlines existing LAX aircraft fleet. During replacement of the apron pavement, the aircraft fuel hydrants, the fuel pipeline outlets embedded into the apron pavement at each parking position, would be relocated to accommodate the new aircraft parking alignment.

Seven of the existing PBBs would be realigned and the remaining eight PBBs would be replaced with modern equivalents. Upgrades to individual aircraft service utilities would be provided at each PBB, to accommodate parked aircraft, including 400 Hz ground power units, preconditioned air units, and potable water cabinets to supply power, air, and potable water, respectively, to stationary aircraft. Electrical chargers would be installed on the Ramp level to support electric GSE.

The demolition and reconstruction of the Satellite building and Satellite Extension would include the development of additional Ramp level offices, support space, and restrooms for air carrier, vendor, and LAWA staff. The existing width of Taxilane C9 would be reduced and the excess area captured for apron



EXISTING

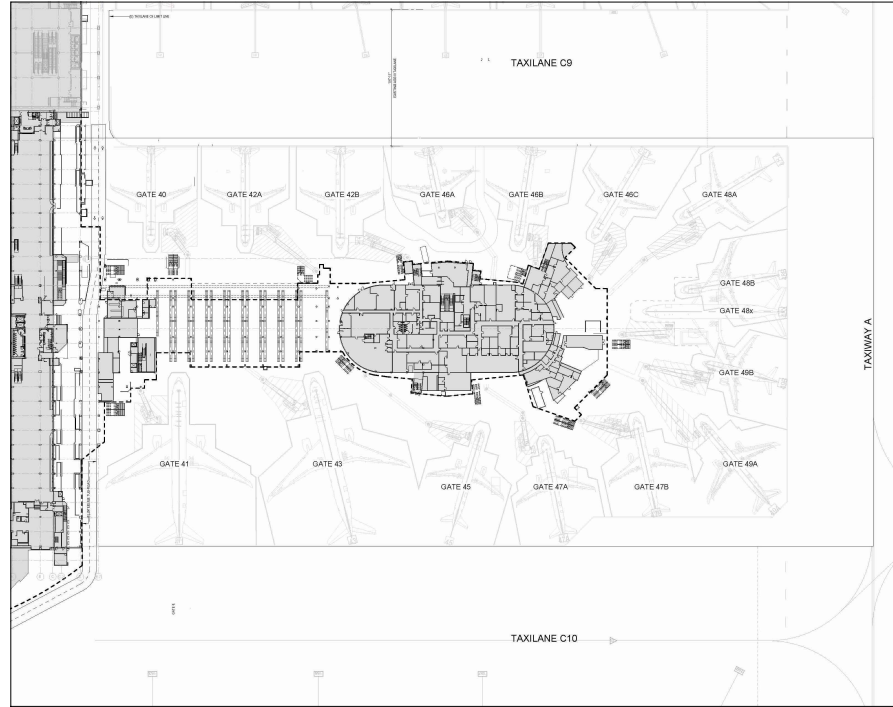


PROPOSED DEVELOPMENT

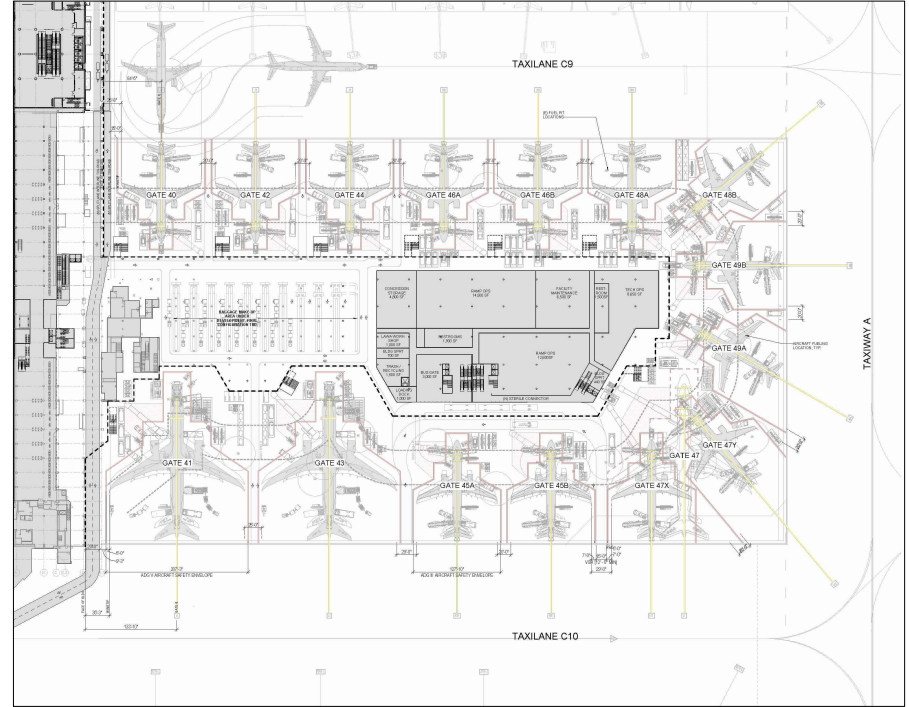
SOURCE: PGAL, May 2019.

0 Not to Scale

EXHIBIT 2-4A
RAMP/APRON LEVEL



EXISTING



PROPOSED DEVELOPMENT

SOURCE: Los Angeles World Airports, Terminal 4/5 Project Definition Booklet, June 2019.

EXHIBIT 2-4B



TERMINAL 4 APRON LEVEL

Drawing: P:\Project-Chicago\LAWA\LAX T4 Improvements\6. AutoCAD\Project Description Exhibits_20191014.dwg Layout: 4B Apron Level Plotted: Oct 14, 2019, 10:01AM

operational purposes and to enable expansion of the T4 Concourse building envelope eastward. The additional apron area would also accommodate a two-lane vehicle service road for use by GSE and other airport support equipment on the apron. Similarly, Taxilane C10 would be realigned to remove a cut-in in the aircraft parking limit line at the southwest corner of the apron, allowing for improved apron operations at T4. No demolition of the existing airfield pavement beyond the T4 Concourse apron would be included as part of the Proposed Project.

2.2.2.2 UTILITIES

Existing Conditions

Many of the existing underground utilities that feed the T4 Concourse are beyond their serviceable lifespan and require replacement in conjunction with the terminal modernization. Existing utilities that require improvements include electrical power, fire and domestic-use water; storm drainage; sanitary sewer; and natural gas.

Proposed Improvements

The Proposed Project would relocate and replace utilities to serve the proposed development. Additions to and enhancements of the T4 utility systems would be required for the new portions of T4, the existing building renovations, and the reconstructed apron area. Standby power utility infrastructure would be installed to support air carrier emergency operations, meet LAWA Design and Construction Handbook requirements, and support life safety systems.

Upgrades to the fire and domestic water system will increase capacity and flow rates to ensure the system is adequate to serve the facility. Improvements will include connecting the fire water loop at T4 to upgraded fire water loops in the Central Terminal Area (CTA). Upgrades to the storm drain system will include modifications to the slopes surrounding the T4 Concourse and relocation and replacement of inlets to meet current National Fire Protection Association 415³ requirements. New service connections from T4 will be constructed to connect to the existing sanitary sewer system and oil/water separators will be installed. Modifications to the natural gas system will be made to correspond to the new configuration and size of building components.

2.2.2.3 OUTBOUND BAGGAGE SYSTEMS

Existing Conditions

The existing T4 Concourse's outbound BHS transports baggage via two mainline conveyors from the West Ticketing Building, within the T4 Headhouse, to the Baggage Make-Up Area, located at the T4 Concourse Ramp level, before the bags are consolidated and hauled to aircraft at the T4 parking positions. The BHS is reaching the end of its serviceable life and does not efficiently meet Airport or air carrier needs.

Proposed Improvements

The existing Ramp level BHS components, under the Connector building, would be modernized with new baggage handling equipment in order to improve operational efficiency to support passenger activity levels including flights at TBIT and at the American Eagle gates. Baggage conveyors, outbound baggage piers, and the manual encoding station will be replaced. In order to accommodate additional outbound baggage piers under the Concourse level, excavation at the apron will be required.

³ National Fire Protection Association, *NFPA 415 Standard on Airport Terminal Buildings, Fueling Ramp Drainage, and Loading Walkways*, 2016.

2.2.2.4 BUS GATE

Existing Conditions

The T4 Ramp level includes a bus gate, and an associated holdroom and shared vertical circulation, through which passengers access shuttle buses operated between the T4 Concourse, the American Eagle Commuter Terminal, and remote gates. The shared vertical circulation is also used by arriving and connecting passengers to access the Arrivals level tunnels. The bus gate (Gate 44) is accessible from the T4 Concourse level via vertical circulation. The existing bus gate does not provide sterile access to the T4 FIS, and is, therefore, only used for domestic operations and international departures. The existing bus gate also serves as a loading dock for materials being delivered to or from T4.

Proposed Improvements

Modifications to the existing T4 Concourse would include a new, consolidated bus gate that would support both international and domestic arrivals and departures. The proposed bus gate would accommodate LAWA and air carrier buses to provide connection from the T4 Concourse to the American Eagle Commuter Terminal and remote gates. A new bus holdroom would be constructed to provide a higher level of service and passenger amenities consistent with the rest of the T4 Concourse. The bus gate would be constructed to include sterile vertical connectivity to the T4 FIS corridor, on the Arrivals level, for international arrivals and vertical circulation to the T4 Concourse level above. A new loading dock on the west side would provide access for deliveries to the building.

2.2.3 CONCOURSE LEVEL

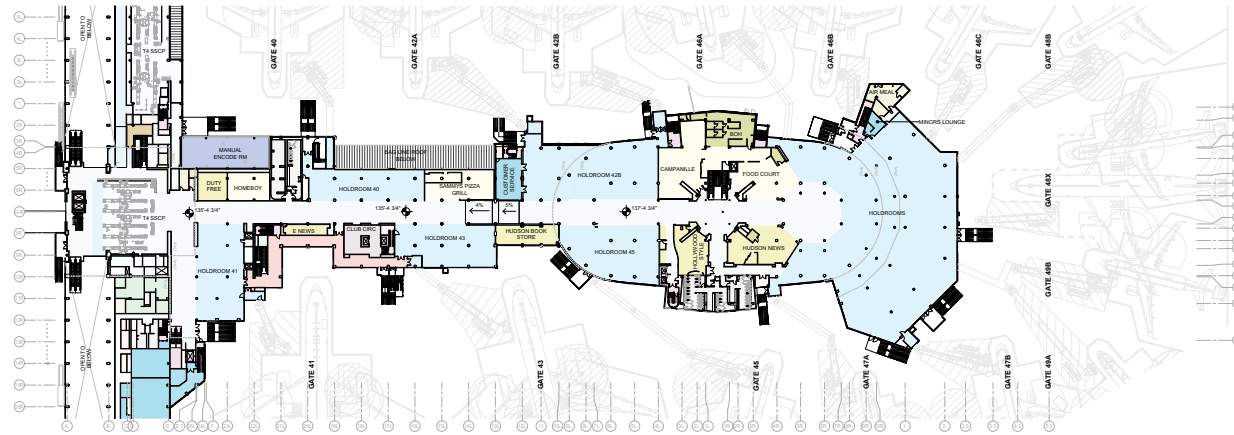
Existing Conditions

The Concourse level is the area of the terminal at which passengers on- and off-board aircraft, wait prior to boarding, and access post-security concessions and other Airport and air carrier services. Specifically, the Concourse level comprises holdrooms; concessions and vendor areas; air carrier and Airport office and support space; storage; and restrooms (see **Exhibit 2-5**). The existing Concourse level of the T4 Connector and Satellite has low ceilings above the holdrooms and concessions areas; a relatively small floor plate; limited natural light; and outdated fixtures and finishes throughout the interior. The holdrooms are undersized for modern fleets and current passenger volumes and the under-sized concessions, vendor, and office space lack many modern amenities. All existing T4 gates currently accommodate domestic flights and international departures. Additionally, Gates 41 and 43 operate as swing gates, via connection to the sterile FIS corridor, thereby accommodating domestic and international arrivals and departures.

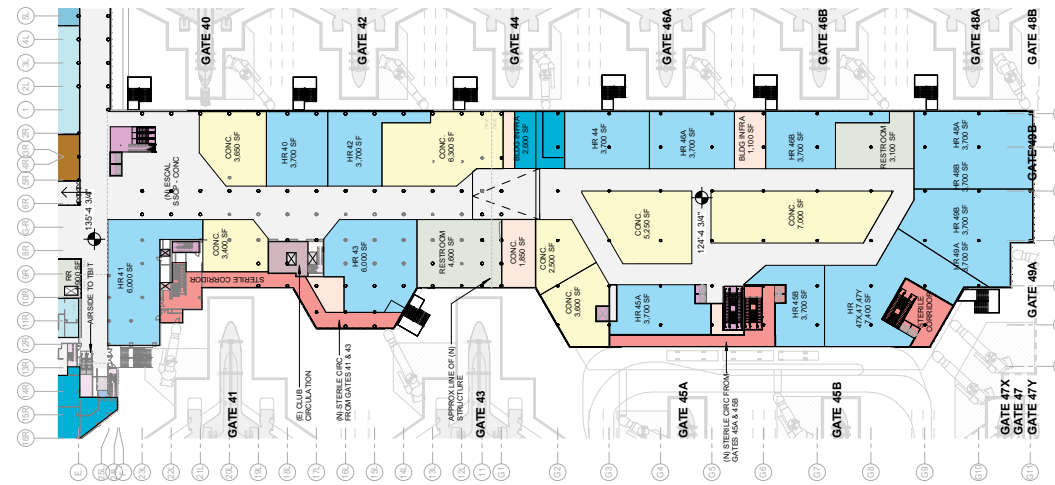
Vertical circulation within the Central Section of the T4 Headhouse provides access to levels below the Concourse level within the T4 Headhouse. Vertical circulation in the West Ticketing Building within the T4 Headhouse provides secure access to the TBIT concourse via the T4/TBIT Secure Connector. Within the T4 Connector building, vertical circulation on the Concourse level provides access to the Club level (above). Vertical circulation within the Satellite provides access from the Concourse level to the bus gate as well as the Arrivals level and the associated tunnels.

Proposed Improvements

The Proposed Project would result in upgrades to the Connector building and the replacement of the existing Satellite and Satellite Extension structures to enhance passenger experience. The Proposed Project would increase the ceiling height of the Concourse south of the existing Connector, widen holdrooms to provide views of the airfield and surrounding landscape, and provide a facade and interior finish consistent with LAWA design standards.



EXISTING



PROPOSED DEVELOPMENT

SOURCE: PGAL, May 2019.

EXHIBIT 2-5
CONCOURSE LEVEL

0 Not to Scale

The Proposed Project would also widen the Concourse's circulation corridor, improving passenger movement during peak passenger periods and enhancing passenger experience. The holdrooms and concessions seating areas would be sized to provide the industry standard for seating areas and queuing space per IATA Optimal Level of Service criteria. Concession space would be increased and finished to modern standards to enhance the passenger experience in the terminal.

The Proposed Project would expand the Concourse level to improve passenger amenities, which would include updated restrooms sized to meet existing and future passenger demand, a nursing room, a pet relief station, and an all-gender restroom. The Proposed Project would also provide sterile corridor access and associated vertical circulation to the Arrivals level from all proposed T4 swing gates. The swing gates would maintain an adaptable T4 FIS connection for international arrivals at up to six (6) of the 15 T4 aircraft parking positions. A new connection to the tunnel to T4 FIS, on the Arrivals level, would connect to new sterile vertical circulation.

2.2.4 CLUB LEVEL

Existing Conditions

The Club level currently contains the American Airlines crew lounge, Admirals Club, and the associated vertical circulation and mechanical space (see **Exhibit 2-6**). The Club level is accessible via vertical circulation on the Concourse level.

Proposed Improvements

The Proposed Project would construct an expansion of the building shell southward to provide additional air carrier and Airport office space and enlarge the existing Admirals Club. The replacement Satellite structure would also provide associated building system upgrades. To maintain airfield visibility from the airport traffic control tower, the height of the proposed Club level improvements would not extend above the existing roof line.

2.2.5 ROOF LEVEL

Existing Conditions

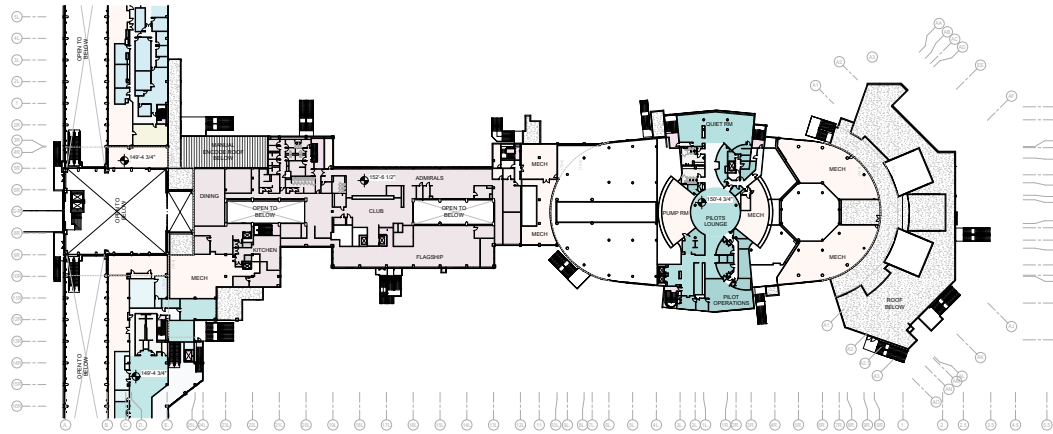
Building system equipment, primarily mechanical air handling units, are located at the roof level. In some cases, the existing equipment is partially enclosed or screened. In many cases the existing equipment is exposed.

Proposed Improvements

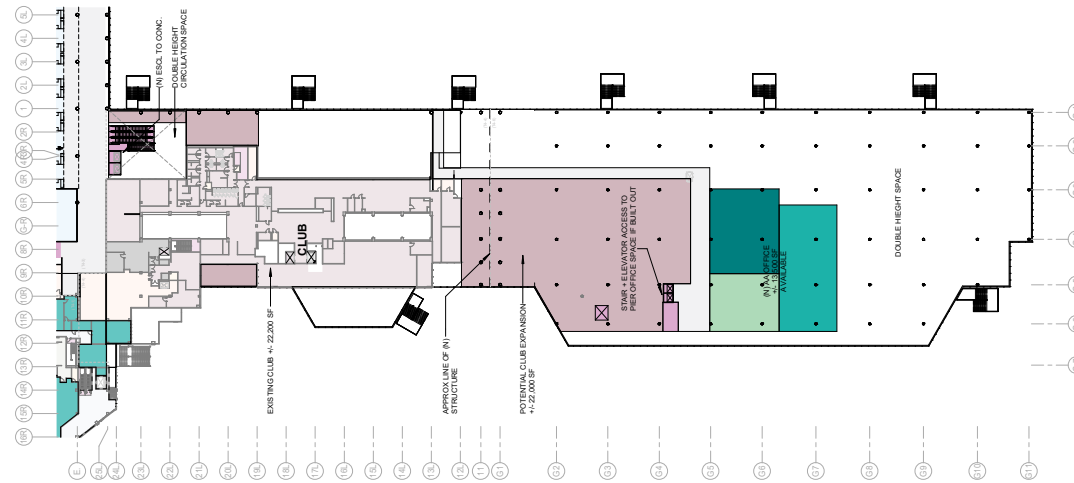
The Proposed Project would replace equipment located on the roof. Enclosures would be constructed on the roof to accommodate the T4 building control systems, utility and telecommunications components, and new equipment, such as mechanical air handling units.

2.2.6 T4 WEST TICKETING BUILDING

The West Ticketing Building within the T4 Headhouse would be renovated to provide passengers with a higher level of service. Interior reconfigurations at each level would correlate to upgraded conditions in adjacent areas, including reconfigured vertical circulation. Work proposed for the T4 West Ticketing Building would not result in an expansion of the existing building.



EXISTING



PROPOSED DEVELOPMENT

SOURCE: PGAL, May 2019.

0 Not to Scale

EXHIBIT 2-6
CLUB LEVEL

2.2.7 CONSTRUCTION PHASING

Construction and demolition associated with the Proposed Project would be separated into three phases to allow efficient construction while reducing operational interference. A minimum of eight T4 gates would remain open throughout implementation of the Proposed Project. American Airlines would conduct operations at T5, TBIT, and/or the Midfield Satellite Concourse (MSC), scheduled to open in 2020, to offset the operations affected by the temporary gate closures at T4.

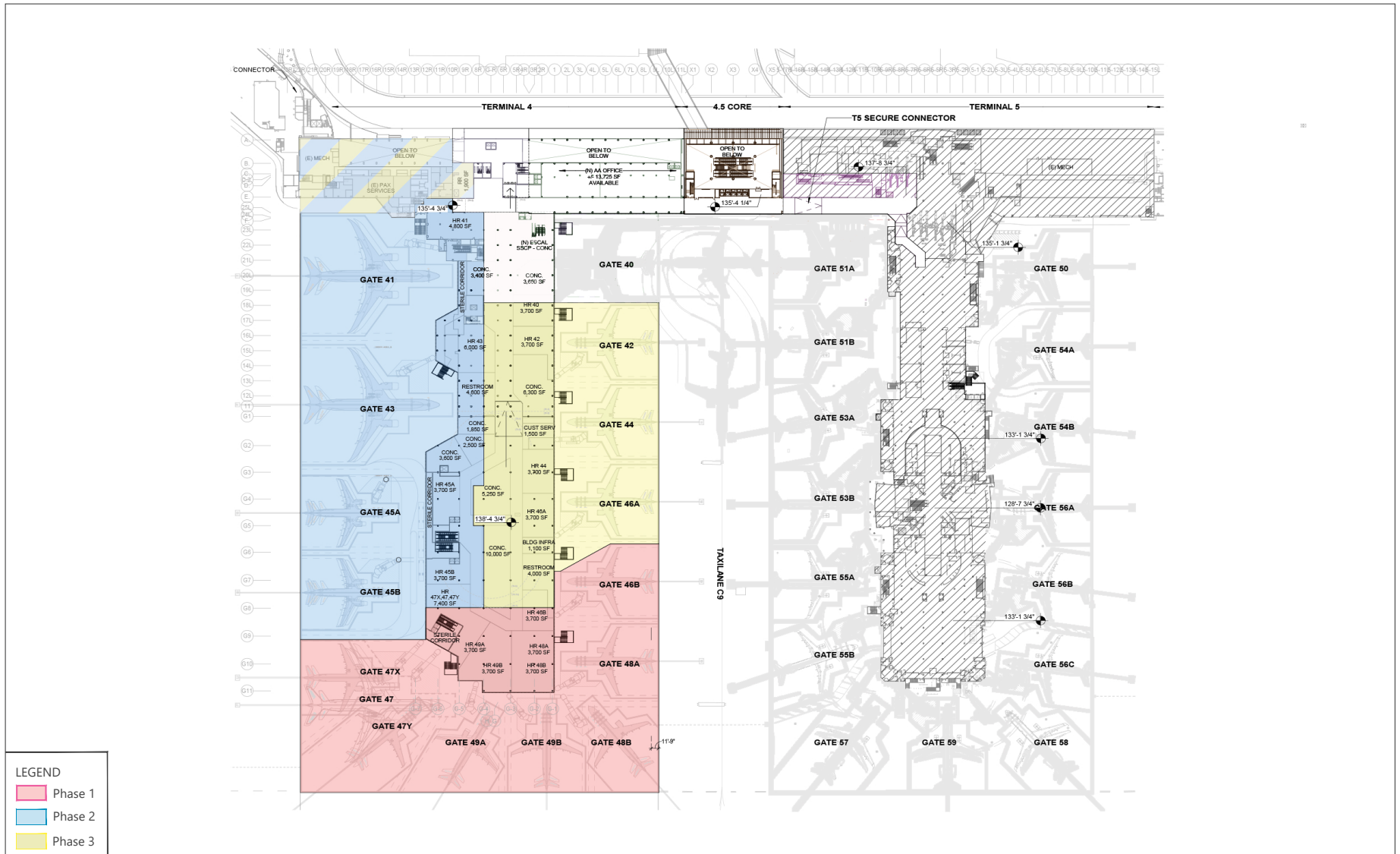
The proposed construction would begin in the third Quarter (Q3) of calendar year 2021 and be completed by Q4 2026. Phase 1, which would begin in Q3 2021, would require closure of the Satellite Extension and 7 aircraft parking positions at the southern terminus of the T4: positions 46B, 46C, 47B, 48A, 48B, 49A, and 49D. During Phase 1, the Satellite Extension would be demolished and replaced with the southernmost portion of the proposed T4 Concourse replacement structure. The portion of the T4 apron which includes the 7 closed aircraft parking positions would be repaved and the aircraft parking positions realigned. Construction employee parking and the majority of the required materials staging areas for the Proposed Project would be located at an off-site location on Airport property between Westchester Parkway and Lincoln Boulevard, approximately 0.8 miles northeast of the Proposed Project site, and at the intersection of South La Tijera Boulevard and Westchester Parkway, approximately 1 mile northeast of the Proposed Project site.

Following the completion of Phase 1 in Q1 2023, the 7 gates and aircraft parking positions closed and realigned as a part of Phase 1 would be reopened. Phase 2, beginning in Q3 2023, would involve closure of 5 aircraft parking positions (40,41, 43, 45, and 47A) to accommodate improvements to the west side of the T4 apron, renovation and expansion of the west side of the existing Satellite and T4 Connector building, and interior renovations to the West Ticketing Building portion of the T4 Headhouse. The Phase 2 renovation, expansion, and apron work would be completed in Q2 2025. Following the completion of Phase 2, 4 of the 5 aircraft parking positions closed for Phase 2 construction would be reopened as well as the west side of the expanded Connector (see **Exhibit 2-7**). Gate 40 may remain closed for use as a construction staging area. Phase 3 would begin in Q3 of 2025 and would include renovation of the east sides of the existing Satellite and T4 Connector buildings; continued interior renovation of the West Ticketing Building portion of the T4 Headhouse; temporary closure of 3 aircraft parking positions (42A, 42B, and 46A); and improvements to the east side of the T4 apron. Upon completion of Phase 3, in Q4 2026, the east side of the T4 Concourse would be opened, completing the Concourse, and the three remaining aircraft parking positions closed as a part of Phase 3 would be returned to service.

2.3 REQUIRED APPROVALS AND CONSULTATIONS

LAWA is the lead agency for the CEQA review of the Proposed Project at LAX and is the “public agency which has the principal responsibility for carrying out or approving [the] project.”⁴ As the lead agency, LAWA is responsible for conducting environmental review of LAX projects under the CEQA Statute and Guidelines. There are no responsible agencies for the project because no other agency has discretionary approval power over the proposed Project or would carry out the project.

⁴ California Code of Regulations, Title 14, §15367; Public Resources Code, §21067.



SOURCE: PGAL, May 2019.

EXHIBIT 2-7
CONSTRUCTION PHASING

3. ENVIRONMENTAL SETTING

3.1 INTRODUCTION

LAX is located in Los Angeles County (LA County), within the City of Los Angeles proper. The Airport is generally bounded by the City of Los Angeles communities of Westchester and Playa del Rey to the north; the City of Inglewood, City of Hawthorne, and Lennox, an unincorporated area of LA County, to the east; the Del Aire area of unincorporated LA County and the City of El Segundo to the south; and the Pacific Ocean to the west (**Exhibit 3-1**). The streets that generally bound the Airport are Vista Del Mar to the west; Imperial Highway to the south; Westchester Parkway to the north; and Sepulveda, Aviation, and La Cienega Boulevards to the east. Existing Airport uses include runways and taxiways; passenger terminals; air cargo and aviation support facilities; parking garages; surface parking lots; airport- and aviation related administrative facilities; utilities; and public and private roadways.

3.2 RELATIONSHIP TO EXISTING PLANS AND DOCUMENTS

The existing plans and documents that are relevant to the Airport and the Project site are described below.

3.2.1 CALIFORNIA COASTAL ACT

The California Coastal Act (CCA) was enacted to establish policies and guidelines that provide direction for the conservation and development of the California coastline and administering the federal Coastal Zone Management Act. The California Coastal Commission (the Coastal Commission), through the CCA, is responsible for the protection of regional, state, and national interests in assuring the maintenance of the long-term productivity and economic vitality of coastal resources necessary for the well-being of the people of the state; avoidance of long-term costs to the public and a diminished quality of life resulting from the misuse of coastal resources; and, continued state coastal planning and management through the state Coastal Commission. Under the provisions of the CCA, development projects located in the coastal zone must receive an additional level of review to assess potential impacts to coastal resources. The western end of LAX is within the coastal zone; however, the coastal zone boundaries lie outside of the Proposed Project site. Developmental regulations of the CCA would not apply to the Proposed Project.

3.2.2 CITY OF LOS ANGELES GENERAL PLAN

California State law (Government Code Section 65300) requires that each city prepare and adopt a comprehensive, long-term general plan for its future development. This general plan must address seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition, State law (Government Code Section 65302) permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. California State law requires that operation of a city be consistent with the general plan. More specifically, Government Code Sections 65860, 66473.5, and 656474 require that zoning ordinances and subdivision and parcel map approvals be consistent with the general plan.



SOURCE: LAX Design Guidelines, 2017. (Modified).

EXHIBIT 3-1
PROJECT AREA MAP

0 Not to Scale

The City of Los Angeles General Plan Framework Element establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a Citywide, comprehensive, long-range growth strategy and defines Citywide policies through the following chapters: Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services. General Plan land use policies are further guided at the community level through community plans and specific plans. The General Plan policies related to transportation are set forth in the Mobility Plan 2035.

The LAX Plan⁵ is the community plan for the LAX area and was adopted concurrently with the LAX Master Plan, approved by the Los Angeles City Council in December 2004 and amended in 2013 and 2017. The LAX Plan is part of the Land Use Element of the City of Los Angeles General Plan. The LAX Plan establishes the land use policy for LAX and is intended to promote an arrangement of airport uses that encourages and contributes to the modernization of the Airport in an orderly and flexible manner within the context of the City and region. It provides goals, objectives, policies, and programs that establish a framework for the development of facilities promoting the movement and processing of passengers and cargo within a safe and secure environment. The LAX Plan is intended to allow the Airport to respond to emerging new technologies, economic trends, and functional needs.

In 2004, in connection with approval of the LAX Master Plan, the City Council approved the LAX Specific Plan.⁶ Amended in 2013, 2016, and 2017, the LAX Specific Plan contains land use regulations and procedures for the processing of future individual projects and activities under the LAX Plan. While the LAX Plan identifies goals, objectives, and policies, the LAX Specific Plan details use limitations and design regulations within the plan area.

3.2.3 LAX DESIGN GUIDELINES

The Los Angeles International Airport Design Guidelines (Design Guidelines) establish LAWA's comprehensive aesthetic and architectural vision for the passenger experience at LAX.⁷ The Design Guidelines provide a basis for new development to create an improved passenger experience that honors LAX's historic and architectural resources, while providing design guidance for new construction and major renovations consistent with Airport needs and existing conditions. The Design Guidelines apply to LAWA development projects, including the Landside Access Modernization Program (LAMP) projects; terminal improvements in the CTA, and CTA parking structures. The Design Guidelines encourage the development of more sustainable and user-friendly spaces with a focus on unified, high quality architecture and urban design with an emphasis on the passenger experience.

3.2.4 LAX DESIGN AND CONSTRUCTION HANDBOOK

The LAX Design and Construction Handbook⁸ (the Handbook) provides guidance for planning, design, construction, project acceptance, and closeout for development at LAX. The Handbook is intended to help projects meet LAWA's

⁵ City of Los Angeles, Department of City Planning, *LAX Plan*, adopted December 14, 2004, last amended May 24, 2013, Available: [http://planning.lacity.org/complan/specplan/pdf/LAXPLAN_AMENDED20130524_FINAL\(SECURED\).pdf](http://planning.lacity.org/complan/specplan/pdf/LAXPLAN_AMENDED20130524_FINAL(SECURED).pdf).

⁶ City of Los Angeles, Department of City Planning, *Los Angeles International Airport (LAX) Specific Plan*, adopted December 14, 2004, last amended June 14, 2016, Available: http://clkrep.lacity.org/onlinedocs/2013/13-0285-s3_ORD_184348_6-15-16.pdf.

⁷ City of Los Angeles, Los Angeles World Airports, *LAX Design and Construction Handbook*, April 2011. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-design-and-construction-handbook-4_15_2011.ashx?la=en&hash=DE1C7ACF6AF57AA13DEDE72B94AAB6845151D04D

⁸ City of Los Angeles, Los Angeles World Airports, *LAX Design and Construction Handbook*, April 2011. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-design-and-construction-handbook-4_15_2011.ashx?la=en&hash=DE1C7ACF6AF57AA13DEDE72B94AAB6845151D04D

expectations for achieving passenger and employee safety, limiting impacts to Airport operations, and enhancing the overall LAWA service environment. The Handbook would be applicable to the Proposed Project.

3.2.5 LAX PRESERVATION PLAN

The LAX Preservation Plan was prepared as part of the Environmental Impact Report for the LAMP.⁹ The Preservation Plan provides direction for identification, study, rehabilitation and protection of historic resources located on the LAX property. The Preservation Plan will serve as the framework for the future repair, maintenance, and alteration of historic resources located on the LAX property and guide the manner in which planning of future projects addresses historic resources during and following construction.

3.2.6 LOS ANGELES MUNICIPAL CODE

The Municipal Code includes regulatory provisions for development within the City of Los Angeles, including building regulations, noise standards, specific plans, and zoning. Where the LAX Specific Plan provides more restrictive zoning and land use requirements, the Specific Plan supersedes the Municipal Code.

⁹ Historic Resources Group. *Los Angeles International Airport Preservation Plan*, Available: <https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/plan-and-ordiance/2016-preservation-plan.pdf>. September 2016.

4. ENVIRONMENTAL IMPACTS

The Environmental Impacts section provides supporting documentation of the environmental impact determinations in the Initial Study Checklist, per Section 15063 of the CEQA Statute and Guidelines. Each response provided below evaluates how the Proposed Project, as defined in the Project Description (Section 2), may affect existing environmental conditions of 20 environmental resource categories at the Proposed Project site and in the surrounding area. The evaluation and discussion are based on the environmental checklist published in the CEQA Guidelines.¹⁰As identified and discussed below, the Proposed Project would not result in significant environmental impacts.

4.1 AESTHETICS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

4.1.1 DISCUSSION – (A AND C)

LAX is located in a fully urbanized area that is surrounded by existing commercial, industrial, and residential uses. The Proposed Project site lies within an active airport terminal complex and airfield and the visual environment is consistent with a large-hub international airport. The Proposed Project site is an active terminal with ticketing, passenger processing, baggage processing and claims areas; passenger holdrooms; gates and passenger boarding bridges; and aircraft apron areas.

Scenic vistas in the vicinity of the Proposed Project site include the Pacific Ocean to the west and the Santa Monica Mountains to the north. Views of these vistas are not available from the Proposed Project site as the topography, the distance between the Airport and the vistas, and existing Airport facilities obstruct viewsheds. Views of the Pacific Ocean from residences located to the north and south of Airport would not be obstructed by the Proposed Project based on the distance and topography of the Proposed Project site to both the residences and the Pacific

¹⁰ CEQA Guidelines, *Appendix G, Environmental Checklist Form*, as amended December 2018.

Ocean. Furthermore, the proposed improvements would not add additional facility height and upon completion would be consistent with the existing visual environment.

Views of the Santa Monica Mountains are available from residences in the El Segundo residential neighborhood to the south of the Proposed Project site. El Segundo views to the Santa Monica Mountains are generally restricted to residences at higher elevations due to existing berms on the south side of Imperial Highway blocking views from lower elevations. The Airport, and in particular T4, is not significantly within, and does not contribute to, scenic vistas from north-facing El Segundo residences at higher elevations.

Terminal improvements would not alter existing long-range views of the Santa Monica Mountains due to the distance of the Proposed Project site to residences and the substantially higher vantage points to the south. While construction of the Proposed Project and the presence of associated construction equipment may be visible, it would be consistent with existing visual character and views of the LAX site. Overall, impacts to scenic vistas would be less than significant.

The Proposed Project involves the modernization and redevelopment of a terminal facility. The Proposed Project would be constructed to the LAX Design Guidelines to be consistent with the aesthetic character of the development area and would be completed in accordance with the California Building Standards Code, the City of Los Angeles Zoning Code, and the LAX Design Guidelines.¹¹ Thus, the Proposed Project would not conflict with any applicable zoning or other regulations governing scenic quality.

Therefore, the implementation of the Proposed Project would not affect public views or alter the scenic quality of the Proposed Project site or surrounding area and would not conflict with any applicable zoning or other regulations governing scenic quality. The impact of the Proposed Project on aesthetics would be less than significant.

4.1.2 DISCUSSION – (B)

The Proposed Project site is located within an active airfield and is not located adjacent to or within the viewshed of a designated state scenic highway. The nearest designated state scenic highway is approximately 4 miles east of the Proposed Project site (California State Route 1, beginning at Venice Boulevard).¹² The Proposed Project site is not visible from the designated scenic highway portion of California State Route 1. Therefore, the Proposed Project would not impact scenic resources within a state scenic highway. The Proposed Project site also does not contain scenic resources, such as trees or rock outcroppings and Terminal 4 is not within the line of site of or adjacent to the Theme Building or former airport traffic control tower. The Proposed Project would not affect views of these notable structures; therefore, the Proposed Project would have no impact.

4.1.3 DISCUSSION – (D)

Uses within and surrounding LAX generate varying degrees of light emissions. Primary sources of light at LAX include buildings (i.e., terminals, cargo, and maintenance facilities, etc.), safety and operational lighting (airfield lighting, parking, street lighting, wayfinding, etc.), and private vehicles, buses, and shuttles. Existing LAX facilities, including Terminal 4, produce light consistent with highly urbanized areas, which specifically provides for the safety and security of people, property, and aircraft operations at LAX. Certain Airport facilities are visible from the Airport's periphery and emit light at intensities beyond average ambient light conditions; however, existing lighting does not

¹¹ Los Angeles World Airports, *LAX Design Guidelines*, March 24, 2017

¹² California Department of Transportation, *California Scenic Highway Mapping System website*, updated September 7, 2011. Available: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

interfere with nighttime Airport operations. Existing sources of glare on the Proposed Project site are associated with the reflective glass or finishes of facilities and structures within the Airport. Existing nighttime sources of glare are primarily associated with Airport facilities and headlights of vehicles traveling throughout the Project site.

The Proposed Project would include interior and exterior enhancements to the T4 structure, and improvements to the apron area. Sources of light and glare associated with the Project may change location and minor additional sources of lighting and glare could be added; however, these changes would be consistent with the existing T4 environment and typical of a modern airport airfield area. The Proposed Project would meet FAA Advisory Circular 150/5300-13A requirements to ensure that new facilities would not pose any hazard to aircraft or air traffic controllers. Based on the above, the implementation of the Proposed Project would not alter lighting to create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts to light and glare would be less than significant.

4.2 AGRICULTURE AND FORESTRY RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				X

4.2.1 DISCUSSION

The Proposed Project site is located within a fully-developed airport, surrounded by airport-related uses and fully developed urbanized areas. There are no farmlands that are considered prime, unique or of statewide or local importance in the vicinity of the Proposed Project site. Furthermore, no agricultural resources or operations currently exist or have existed in the recent past on or in vicinity of the Proposed Project.¹³ No agricultural resources, operations, or land under the Williamson Act are on the Proposed Project site or within the surrounding areas. Additionally, no forest or timberland resources exist at or in the vicinity of the Proposed Project site. Consequently,

¹³ City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report, Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, April 2004.

the Proposed Project would have no impact on agriculture and forestry resources. The Proposed Project would not impact agriculture or forest resources.

4.3 AIR QUALITY

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

4.3.1 DISCUSSION (A, B, AND C)

The South Coast Air Quality Management District (SCAQMD) has adopted a series of Air Quality Management Plans (AQMPs) to meet the CAAQS and NAAQS. SCAQMD and CARB have adopted the 2012 AQMP which incorporates the latest scientific and technological information and planning assumptions, including the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and updated emission inventory methodologies for various source categories. The Final 2012 AQMP was adopted by the AQMD Governing Board on December 7, 2012. SCAQMD released the Draft 2016 AQMP for public review on June 30, 2016. The Draft 2016 AQMP includes baseline emissions assumptions consistent with the 2016 RTP/SCS, approved by SCAG on April 7, 2016 and approved by EPA on October 1, 2019 but not effective until October 31, 2019. The AQMP builds upon other agencies' plans to achieve federal standards for air quality in the Basin. It incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, and on-road and off-road mobile sources. The 2016 AQMP builds upon improvements in previous plans, and includes new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound and flexible compliance approaches. In addition, it highlights the significant amount of emission reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the federal CAA.

The SCAQMD also adopts rules to implement portions of the AQMP. At least one of these rules is applicable to the construction of the Proposed Project. Rule 403 requires the implementation of best available fugitive dust control measures during active construction activities capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. Also, SCAQMD Rule 113 limits the amount of VOCs from architectural coatings in solvents, which lowers the emissions of odorous compounds.

The Proposed Project would comprise improvements to the T4 Concourse and West Ticketing Building, including renovation and reinforcement of the T4 Connector and reconstruction of the Satellite and Satellite Extension.

Additionally, the aircraft apron pavement surrounding T4 would be demolished and replaced. The proposed improvements would improve safety and efficiency at T4 while maintaining the existing number of aircraft gates.

Regarding National Ambient Air Quality Standards (NAAQS), established under the Clean Air Act (CAA), the South Coast Air Basin, which includes LAX, is in attainment for nitrogen dioxide (NO₂), sulfur dioxide (SO₂), carbon monoxide (CO), and particulate matter less than ten microns in diameter (PM₁₀); extreme nonattainment for ozone (O₃); and serious nonattainment for particulate matter less than 2.5 microns in diameter (PM_{2.5}).¹⁴ For the California Ambient Air Quality Standards (CAAQS), the South Coast Air Basin is designated as a nonattainment area for ozone (O₃), PM₁₀, and PM_{2.5}, and attainment for CO, NO₂, and SO₂.¹⁵ While portions of the Basin are in nonattainment, cumulative conditions have improved since the inception of air pollutant monitoring in 1976. Despite an approximately 30 percent increase in the state's vehicle population and vehicle miles traveled since 1990, air quality in the state has dramatically improved. In 1990, the entire South Coast region exceeded the 80 parts per billion (ppb) 8-hour ozone standard. Today, California has reduced emissions by over half, ozone concentrations have declined 40 percent, and the number of days when pollution levels exceed the 80 ppb ozone standard has declined by more than 60 percent. As discussed in the 2016:

Since the end of World War II, the Basin has experienced faster population growth than the rest of the nation. The annual average percent growth has slowed but the overall population of the region is expected to continue to increase through 2023 and beyond... Despite this population growth, air quality has improved significantly over the years, primarily due to the impacts of air quality control programs at the local, state and federal levels....PM_{2.5} levels in the Basin have improved significantly in recent years. By 2013 and again in 2014 and 2015, there were no stations measuring PM_{2.5} in the Basin violating the former 1997 annual PM_{2.5} NAAQS (15.0 µg/m³) for the 3-year design value period with the filter-based federal reference method (FRM). On July 25, 2016 U.S. EPA finalized a determination that the Basin attained the 1997 annual (15.0 µg/m³) and 24-hour PM_{2.5} (65 µg/m³) NAAQS, effective August 24, 2016.

Following construction, operation of T4 would not result in a significant increase in emissions. The renovated T4 facility would serve in the same capacity as the existing T4 Concourse; facilitating existing and forecast passenger levels at 15 aircraft gates. Improvements to the apron and taxiways proposed as a part of the T4 Modernization project would be relatively minor and would not induce growth in aircraft operations or result in a change to aircraft procedures. The proposed project may also reduce regional air pollutant emissions. In addition to adherence to the LAX Design Guidelines, the Proposed Project would incorporate modern building materials and internal systems technology in accordance with the Los Angeles Green Building Code, Los Angeles Green New Deal, and LEED® Silver requirements, resulting in an increase in energy efficiency for T4 operations. Further, the Proposed Project is targeting a 12 to 14 percent increase in energy efficiency over baseline demand. To the extent possible, if approved by FAA, solar photovoltaic panels will be installed on the T4 roof, which would reduce energy demand even further and produce renewable energy credits.

¹⁴ US Environmental Protection Agency, Green Book, California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, https://www3.epa.gov/airquality/greenbook/anayo_ca.html (accessed September 12, 2019).

¹⁵ <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf> (accessed September 12, 2019).

A quantitative and qualitative air quality analysis was performed for construction of the Proposed Project (see **Attachment 1**).¹⁶ As shown in **Table 4-1**, emissions associated with construction of the Proposed Project would not exceed the mass daily thresholds of significance for construction defined by SCAQMD and pursuant to the California Clean Air Act.¹⁷

TABLE 4-1: PROPOSED PROJECT CONSTRUCTION EMISSIONS SUMMARY

YEAR BY PHASE	EMISSIONS (POUNDS/DAY)						
	CO	VOC	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO _{2E}
Phase 1							
2021	15	2	21	0	3	1	2,976
2022	25	35	43	0	23	5	10,806
2023	23	2	32	0	27	5	10,482
Phase 2							
2023	21	2	22	0	3	1	4,834
2024	29	46	37	0	22	5	11,309
2025	16	1	18	0	26	7	6,953
Phase 3							
2025	20	2	20	0	2	1	4,762
2026	28	46	31	0	11	4	9,053
Maximum Daily Emissions							
2021	15	2	21	0	3	1	2,976
2022	25	35	43	0	23	5	10,806
2023	23	2	32	0	27	5	10,482
2024	29	46	37	0	22	5	11,309
2025	20	2	20	0	26	7	6,953
2026	28	46	31	0	11	4	9,053
Overall Maximum	29	46	43	0	27	7	11,309
<i>Mass Daily Threshold of Significance</i>	550	75	100	150	150	55	--
Significant?	No	No	No	No	No	No	

NOTES:

CO = carbon monoxide

SO_x = oxides of sulfur

VOC = volatile organic compound

PM₁₀ = particulate matter less than ten microns in diameterNO_x = oxides of nitrogenPM_{2.5} = particulate matter less than 2.5 microns in diameterCO_{2e} = carbon dioxide equivalent (in metric tons per year)

Totals may not sum due to rounding.

SOURCE: Ricondo & Associates, Inc., October 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and default calculations performed within the California Emissions Estimator Model version 2016.3.2.

The Proposed Project would not result in an increase in number of passengers or aircraft operations at LAX and the improved T4 Concourse would operate in the same location, and in the same manner, as the existing T4 Concourse. Neither construction nor operation of the Proposed Project would conflict with the SCAQMD Air Quality Management Plan, the California State Implementation Plan (SIP), or inhibit the reduction of criteria pollutants, or increase toxic risk.

Minimum passenger level of service requirements for LAX require that a minimum of eight aircraft gates remain open at T4 during construction of the Proposed Project, which would require the construction to be extended over

¹⁶ Air quality analysis assumptions were based on schedule and equipment data provided by LAWA. It was assumed that diesel construction equipment over 50 horsepower would perform to Tier 4 emission standards. Further detail is provided in Attachment 1.

¹⁷ South Coast Air Quality Management District. South Coast AQMD Air Quality Significance Thresholds. April 2019.

a period of approximately 5.5 years. Air quality analysis for the Proposed Project determined the proposed construction would not exceed CAAQS mass daily thresholds of significance, in compliance with the SIP and the SCAQMD Air Quality Management Plan. Based on SCAQMD’s cumulative air quality impact methodology, SCAQMD recommends that if an individual project results in air emissions of criteria pollutants (ROG, CO, NO_x, SOX, PM₁₀, and PM_{2.5}) that exceed the SCAQMD’s recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. As outlined in Table 4-1 below, the Proposed Project would not result in a cumulatively considerable net daily or annual increase in criteria pollutants for which the region is in non-attainment per state or federal standards respectively.

The Proposed Project would partially demolish, renovate, and reconstruct the T4 Concourse at LAX. The Proposed Project would be consistent with existing Airport uses and would not result in an increase in the number of passengers or aircraft operations at the Airport. Adjacent land uses within the CTA are consistent with airport terminal and airfield activities and are compatible with the Proposed Project. The temporary closure of aircraft gates and displacement of operations at those gates to MSC, TBIT, or T5 would not substantially change aircraft taxi patterns or result in a significant change in jet fuel usage. As demonstrated in analyses conducted analyzing aircraft taxiing shifts to the MSC from other CTA terminals, the central location of MSC (and by extension TBIT) on the LAX airfield means that on average, aircraft taxi distance does not significantly change.¹⁸ The Proposed Project would neither expose sensitive receptors to substantial pollutant concentrations or result in other emissions that adversely affect a substantial number of people on- or off-Airport.

4.3.2 DISCUSSION (D)

The use of diesel equipment during construction would generate odors. Diesel equipment emits a distinctive odor that may be considered offensive to certain individuals. The closest sensitive receptors to the Project site are residences in El Segundo, located approximately 3,000 feet south of the Proposed Project site. Due to the temporary nature of construction activities, combined with variabilities in wind speed and direction as related to the dispersion of construction emissions and distances to nearby receptors, odors from construction-related diesel exhaust would not affect a substantial number of people. The Project site is located at LAX, which is characterized by airport operations, including aircraft movement, passenger transport and processing, and maintenance activities. The Proposed Project would result in the continuation of airport operations consistent with existing aircraft activity, passenger transport or processing, and maintenance activities at LAX and would not notably change existing odors at or in the vicinity of the Project site. Therefore, operation of the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

4.4 BIOLOGICAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans,				X

¹⁸ City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report, Los Angeles International Airport (LAX) Midfield Satellite Concourse*, June 2014.

	policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	X
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	X
d)	Interfere substantially with the movement of any native 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?	X
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	X
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	X

4.4.1 DISCUSSION

The Proposed Project is located entirely on Airport property in an area that is fully developed with no significant biological resources. The Proposed Project would renovate and reconstruct an existing passenger concourse building that would operate in a manner consistent with existing conditions. The Proposed Project site does not contain riparian or other sensitive natural habitat, including Coastal Zone or wetlands. Additionally, the Proposed Project does not support habitat for sensitive or special status species and would not interfere with the movement of any migratory fish or wildlife species. The implementation of the Proposed Project would not conflict with any local policies or ordinances protecting biological resources. There are no trees at the Proposed Project site; therefore, no native trees protected by City of Los Angeles Ordinance No. 177404 would be impacted.¹⁹

The implementation of the Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Los Angeles Airport / El Segundo Dunes (Dunes) Specific Plan is applicable to the Dunes area immediately west of the Airport and approximately 7,000 feet southwest of the Proposed Project site.²⁰ The Dunes comprise approximately 300-acres of sand dune ecosystem that contains state-designated sensitive habitat for 11 rare species of flora and fauna.^{21,22} However, due to the distance between the Proposed Project site and the Dunes, the Proposed Project would not impact the Dunes nor would it have a substantial adverse effect, either

¹⁹ City of Los Angeles, *Ordinance No. 177404, Protected Tree Relocation and Replacement*, effective April 23, 2006. https://planning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf

²⁰ City of Los Angeles, *Ordinance No. 167940, Los Angeles Airport / El Segundo Dunes Specific Plan*, effective June 28, 1992. <https://planning.lacity.org/complan/specplan/pdf/laxdunes.pdf>

²¹ City of Los Angeles, Department of City Planning, *Los Angeles International Airport, LAX Plan*, 2004. https://www.lawa.org/-/media/lawa-web/lawa-our-lax/finallaxplan_092904.ashx

²² City of Los Angeles, *Ordinance No. 167940, Los Angeles Airport / El Segundo Dunes Specific Plan*, effective June 28, 1992. <https://planning.lacity.org/complan/specplan/pdf/laxdunes.pdf>

directly or through habitat modifications, on any species listed as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife (CDFW), or by the US Fish and Wildlife Service (USFWS). The Proposed Project would have no impact on biological resources.

4.5 CULTURAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?				X

4.5.1 DISCUSSION (A)

The Proposed Project would be constructed on a completely developed portion of the Airport, within the CTA. There are no known historic resources within the T4 Concourse or the associated Ticketing Building. The Satellite and Ticketing Building were opened in the 1960's in succession with the other original satellite and ticketing buildings; however, substantial modifications and multiple renovations have occurred within and adjacent to T4 in the decades since and neither the Satellite or Ticketing Building are eligible as historic resources.²³ Five buildings, including Hangar One, the Theme Building, the 1961 Airport Traffic Control Tower, the Proud Bird Restaurant, and the Quonset Hut; one structure, the World War II Munitions Bunker; and one additional object, the Terminal 6 Tower Sign, have been identified for preservation on LAX property.

Hangar One is listed in the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register).²⁴ The Theme Building was designated as a City of Los Angeles Historic Cultural Monument in 1993 and is eligible for listing in the National Register and California Register. The 1961 Airport Traffic Control Tower and the Terminal 6 Tower Sign are eligible for listing as City of Los Angeles Historic Cultural Monuments. The Quonset Hut is eligible for listing in the National Register, California Register, and as a City of Los Angeles Historic Cultural Monument. The Proud Bird Restaurant has been recognized in the City of Los Angeles Historic Resources Survey as a contributor to the commercial development of the surrounding area and is eligible as a City of Los Angeles Monument. The World War II Munitions Storage Bunker is eligible for listing in the National Register and California Register as a potential contributor to a thematic district or group respectively. The Proposed Project would renovate and reconstruct portions of T4 at a scale similar to that of the existing T4 Concourse. Construction equipment would be restricted to the T4 Concourse area and would not result in significant

²³ Historic Resources Group. *Los Angeles International Airport Preservation Plan*. Available: <https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/plan-and-ordiance/2016-preservation-plan.pdf>. September 2016.

²⁴ Historic Resources Group. *Los Angeles International Airport Preservation Plan* Available: <https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/plan-and-ordiance/2016-preservation-plan.pdf>. September 2016.

obscuration of any building or structure identified for historic or cultural preservation. Therefore, neither construction nor operation of the Proposed Project would impact any of the elements identified for historic preservation.

The subgrade arrivals level tunnel between the Satellite building's vertical circulation stairs and the baggage carousels contains a mosaic tile mural, a remnant feature which is not eligible for consideration as an individual or contributing historic resource because it does not meet the necessary National Register, California Register, or local criteria for listing. The mosaic mural tunnel would not be altered or otherwise affected during construction of the Proposed Project and would remain in use following construction. The Proposed Project would not impact the significance of any historic resource at LAX.

4.5.2 DISCUSSION (B AND C)

An investigation of cultural resources completed for the 2004 LAX Master Plan revealed that within a radius of approximately 2 miles of the center of LAX proper, 36 archeological sites have been recorded, eight of which are located within the LAX property boundary.²⁵ None of the eight sites identified on LAX property are located within the boundaries of the Proposed Project site or in the immediate vicinity. The Project site is a highly disturbed area used for airport uses. Any resources that may have existed on the site at one time are likely to have been displaced and, as a result, the overall sensitivity of the site with respect to buried resources is low.

LAWA has developed and adopted plan, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's Archaeological Treatment Plan (ATP).²⁶ LAWA requires all construction projects at LAX to comply with the ATP and will apply this requirement to the Proposed Project. In the event human remains or other significant archeological resources are inadvertently discovered during construction, the contractor would stop work and notify LAWA representatives and follow the ATP, Native American Graves Protection and Repatriation Act provisions, and applicable state and local regulations. This includes the California Health and Safety Code Section 7050.5 which requires that in the event of discovery or recognition of any human remains, there shall be no further excavation until the coroner has made recommendations concerning the treatment and disposition of the human remains to the person responsible. If the coroner determines that the remains are not subject to Los Angeles County Coroner authority and has reason to believe that the discovery may be a tribal resource, the Los Angeles County Coroner shall contact the Native American Heritage Commission within 24 hours. Additionally, the San Gabriel Band of Mission Indians has requested and would receive notification prior to excavation associated with the Proposed Project. Given the lack of known cultural resources within the Proposed Project area and the precautions in place to monitor for and respond to accidental discovery, the Proposed Project would have a less than significant impact on archeological resources or disturbance of human remains.

²⁵ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

²⁶ City of Los Angeles, *Los Angeles World Airports, Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/archaeological_treatment_plan.ashx?la=en&hash=9833B1960E1AE662518B5517DB42CA42F55FAE0E, prepared by Brian F. Smith and Associates, June 2005.

4.6 ENERGY

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

4.6.1 DISCUSSION

Construction of the proposed Project would consume energy in the form of electricity, natural gas, and transportation-related fuels, through use of construction equipment, transport of construction materials, temporary lighting, etc. However, the implementation of the Proposed Project is expected to decrease overall energy demand at T4. The physical environmental impacts associated with the burning of fuels for construction of the Proposed Project have been accounted for in Section 4.3, Air Quality, and Section 4.8, Greenhouse Gas Emissions. Fuels associated with construction are widely available. Additionally, all diesel-fueled construction equipment would be required to be fitted with the best available emission control devices and would be required to use renewable diesel fuel for at least 90 percent of fuel demand.²⁷ The U.S. Environmental Protection Agency (EPA) also sets emission standards for construction equipment. The current iteration of emissions standards for construction equipment are the ‘Tier 4’ efficiency requirements, which are described in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). All diesel-powered equipment over 50 horsepower employed during construction of the Proposed Project would be Tier 4 equipment.

Construction materials used for the proposed T4 Concourse and airfield improvements must adhere to the specifications identified in the LAX Sustainable Design & Construction Requirements document, including a minimum amount of local and recycled materials. The Proposed Project would also be subject to Los Angeles Green Building Code Tier 1 conformance requirements and the City’s Low Impact Development Ordinance for design and operation.

The Proposed Project would not increase the Airport’s operational capacity. While the Proposed Project would be operated similar to the existing T4 Concourse, the updated design, materials, and building systems used for the Proposed Project are expected to reduce operational energy demands at T4. The existing structures and associated building systems comprising T4 are more than 20 years old and modern equivalent systems and materials are generally more energy efficient. In addition to adherence to the LAX Design Guidelines, the Proposed Project would incorporate modern building materials and internal systems technology in accordance with the Los Angeles Green Building Code, Los Angeles Green New Deal, and LEED® Silver requirements, resulting in an increase in energy efficiency for T4 operations. Further, the Proposed Project is targeting a 12 to 14 percent increase in energy efficiency over baseline demand. To the extent possible, if approved by FAA, solar photovoltaic panels will be installed on the T4 roof, which would reduce energy demand even further and produce renewable energy credits.²⁸

²⁷ Los Angeles World Airports. *Los Angeles International Airport Sustainable Design & Construction Requirements*. August 4, 2017.

²⁸ Bartholomew, Brian D., PGAL. Email to Carter Atkins, LAWA, RE: Terminal 4 Sustainability. October 8, 2019.

Based on the energy efficiency requirements for construction of the Proposed Project and the modern materials and systems with which the Proposed Project would be developed, the implementation of the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of fuel or conflict with or obstruct any applicable renewable energy or energy efficiency plans. Construction of the Proposed Project would require use of renewable and non-renewable energy sources; however, the increase in energy demand would be temporary and construction would be completed consistent with LAWA Design and Construction Handbook requirements and LAWA sustainability requirements. The temporary closure of aircraft gates and displacement of operations at those gates to MSC, TBIT, or T5 would not substantially change aircraft taxi patterns or result in a significant change in jet fuel usage. Therefore, the Proposed Project would have a less than significant impact on energy.

4.7 GEOLOGY/SOILS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 			X	
b) Result in substantial soil erosion or the loss of topsoil?				X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

4.7.1 DISCUSSION

The Proposed Project is located within the seismically active southern California region; however, the Proposed Project is not located within an Alquist-Priolo Fault Zone, and there is no evidence of faulting (displacement that occurs along the surface of a fault during an earthquake) at the site.²⁹ The nearest mapped fault, the Newport-Inglewood Fault Zone, is located approximately 3.6 miles from the Proposed Project site.³⁰ The Charnock Fault, a potentially active fault, may be located near or through the eastern portions of the Airport; however, this fault is not located at the Proposed Project site, and the potential for surface rupture associated with this fault is considered low.³¹

²⁹ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Technical Report, 12, Earth/Geology Technical Report, January 2001.

³⁰ City of Los Angeles, Department of City Planning, ZIMAS, <http://zimas.lacity.org/> (accessed August 29, 2019).

³¹ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Technical Report, 12, Earth/Geology Technical Report, January 2001.

As discussed in Section 2.1, the substructures within the existing Connector building, the Satellite, and the Satellite Extension are all seismically deficient. The design and construction of the Proposed Project would improve structural integrity and safety in comparison to existing conditions and would comply with current Los Angeles Building Code (LABC), California Building Standards Code (CBSC), and American Society of Civil Engineers (ASCE) codes and standards to reduce risks associated with fault rupture or strong seismic ground shaking. Additionally, all construction activities would comply with Occupational Safety and Health Administration (OSHA) and the Division of Occupational Safety and Health of California (Cal/OSHA) requirements. As such, the potential for substantial direct or indirect adverse effects resulting from rupture of a known earthquake fault or strong seismic ground shaking would be less than significant during construction and operation of the Proposed Project.

The Proposed Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Proposed Project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The California Department of Conservation (CDC) has developed Seismic Hazard Zone maps which chart areas prone to liquefaction and earthquake-induced landslides. According to the Seismic Hazard Zone map for the Venice Quadrangle (within which the Proposed Project is located), no potential liquefaction zones are located at the Airport.³² While the Dunes west of the Airport are located in a liquefaction zone, given the flat topography of the Proposed Project site and the distance from the Dunes, the Proposed Project's vicinity to the liquefaction zones would not pose a risk to the Proposed Project site.

The Proposed Project site is flat and surrounded by existing Airport development. The City of Los Angeles Landslide inventory and Hillside Areas map does not identify any areas near the Proposed Project that may contain unstable slopes which may be prone to seismically-produced landslides.³³

The Proposed Project site has flat topography comprised entirely of impervious surfaces such as asphalt, concrete, and structures, and the Proposed Project would maintain this impervious character following construction. All construction would comply with LABC Sections 91.7000-91.7016, which include construction requirements for grading, excavation, and use of fill. In addition, an erosion control plan would be implemented before construction if grading exceeds 200 cubic yards and occurs between November and April. Construction would comply with the Municipal Separate Storm Sewer System (MS4) Construction General Permit which requires the preparation of a construction Storm Water Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs), including for erosion and sediment control for ground disturbance of an acre or more. Therefore, no significant soil erosion is expected to occur.

Fill materials such as clay and silt, in some portions of the Airport, could be prone to expansion, which could damage structural foundations and engineered structures.³⁴ The Proposed Project would be constructed in compliance with current LABC, CBSC, and ASCE requirements and would not result in any structural or engineering modifications that could increase exposure of people or structures to risks associated with expansive soils.

³² State of California, Natural Resources Agency, Department of Conservation, *Earthquake Zones of Required Investigation, Venice Quadrangle, California Geological Survey*, March 25, 1999, <http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/VENICE.pdf>.

³³ City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, November 1996. <https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf>

³⁴ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Technical Report, 12, Earth/Geology Technical Report, January 2001.

The Proposed Project site is located in a developed area where wastewater infrastructure is currently in place. The Proposed Project would use the existing wastewater infrastructure and would not use septic tanks or alternative wastewater disposal systems.

LAWA requires all construction at the Airport to comply with the Paleontological Management Treatment Plan (PMTP), which contains plans, policies, and procedures that address potential impacts to paleontological resources.³⁵ The PMTP focuses on the identification, recovery, proper treatment, and long-term protection and archival conservation of expected and unexpected paleontological discoveries of federal, state, and/or local significance. As part of the PMTP, monitoring for any previously unknown paleontological resources would occur, and any and all discoveries would be handled pursuant to the PMTP. As the Proposed Project site has been previously disturbed and is currently developed, there is a low likelihood of encountering any paleontological discoveries of significance. However, in the event that paleontological deposits are encountered, the PMTP would be used as a guideline for the evaluation, recovery, treatment and archival conservation of such resources in a manner consistent with the generally accepted practices of the scientific paleontological community as well as the general intent and specifications of CEQA.

The Proposed Project would have a less-than-significant impact or no impact with regard to geology/soils.

4.8 GREENHOUSE GAS EMISSIONS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

4.8.1 DISCUSSION

Gases that trap heat in the atmosphere are called GHGs. The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different global warming potentials (GWPs) and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, SF₆ is a GHG commonly used in the utility industry

³⁵ Los Angeles World Airports, Environmental Management Division, *LAX Master Plan Mitigation Monitoring & Reporting Program, Paleontological Management Treatment Plan*, December 2005 (Revised). <https://www.lawa.org/en/lawa-our-lax/studies-and-reports/mitigation-monitoring-reporting-program>

as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually worldwide, is a much more potent GHG with 22,800 times the GWP as CO₂. Therefore, an emission of 1 metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO₂e (Intergovernmental Panel on Climate Change [IPCC] 2007). Large emissions sources are reported in million metric tons (MMT) of CO₂e (MMT CO₂e).

The Proposed Project would comprise partial demolition, renovation, and construction of an existing airport terminal facility at LAX. Greenhouse gas (GHG) emissions are generally identified as CO₂, Methane (CH₄), N₂O, and fluorinated gases. CH₄ is generally associated with the production and transport of coal, natural gas, and oil or a derivative of agricultural processes and, as such, would not be generated during construction or operation of the Proposed Project³⁶. Fluorinated gases are generally emitted in small amounts during a variety of industrial processes (e.g., refrigeration and aluminum and semiconductor manufacturing) not expected to take place during or as a result of the Proposed project at a significant scale.

As discussed in Section 4.3 of the Initial Study, construction of the Proposed Project would result in emissions from construction-related activities including use of on- and off-road equipment, worker commuting, materials delivery and haul trips, and application of architectural coatings. Emissions associated with construction of the Proposed Project were calculated and described in detail in Attachment 1. The Proposed Project would incorporate modern building materials and internal systems technology in accordance with the Los Angeles Green Building Code, Los Angeles Green New Deal, and LEED® Silver requirements, resulting in an increase in energy efficiency for T4 operations. Further, the Proposed Project is targeting a 12 to 14 percent increase in energy efficiency over baseline demand. To the extent possible, if approved by FAA, solar photovoltaic panels will be installed on the T4 roof, which would reduce energy demand even further and produce renewable energy credits.

The CalEEMod analysis of the proposed Project determined construction of the proposed Project would generate greenhouse gas (GHG) emissions as a result of construction vehicle traffic and the operation of construction equipment (see **Table 4-2**).

³⁶ U.S. Environmental Protection Agency. Overview of Greenhouse Gases (Available: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>). Accessed October 2019).

TABLE 4-2: PROPOSED PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS

YEAR	MT CO ₂ e
2021 (Demolition)	89
2022 (Demolition)	430
2023	265
2024	603
2025	144
2026	547
Total	2,078

NOTE:

MT CO₂e—metric tons of CO₂ equivalent

SOURCE: Ricondo & Associates, Inc., January 2019

SCAQMD criteria for GHG emissions include direct, indirect, and, to the extent information is available, life cycle emissions during construction and operation³⁷. Further, construction emissions are amortized over the life of the project, defined as 30 years, and added to operational emissions for comparison to the applicable GHG significance tier specified in the interim guidance. The existing facility does not generate direct GHG emissions, but does produce indirect emissions from energy use, heating, and cooling; once constructed the Proposed Project would produce similar indirect emissions. Based on an amortization rate of 30 years, the Proposed Project would generate 69.3 MT CO₂e on an annual basis. However, with the 12 to 14 percent increase in energy efficiency over baseline demand, it is anticipated that these emissions would be offset resulting in either a decrease or no net increase in emissions over existing conditions.

Construction and operation of the Proposed Project would be consistent with the City of Los Angeles Green New Deal Sustainability Plan, which is directed towards reduction of GHG emissions and advancement of sustainable development within the City of Los Angeles, as well as the California Climate Change Scoping Plan, which is the state's strategy for meeting GHG reduction goals established by the Global Warming Solutions Act of 2006 (California Assembly Bill 32). Construction of the Proposed Project would be completed in accordance with LAWA Design and Construction Handbook guidelines and LAWA Sustainability Action Plan objectives, which are consistent with the City of Los Angeles Green New Deal Sustainability Plan,³⁸

The Proposed Project would include installation of electrical vehicle infrastructure, use of recycled and sustainably sources building materials, implementation of sustainable building practices, and benefit from energy efficient design and building systems. LAX is currently certified at Level 2-*Reduction* by the Airport Carbon Accreditation Program,³⁹ and will continue to participate in the program to achieve LAWA's goal of reducing LAWA-controlled

³⁷ South Coast Air Quality Management District. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. December 5, 2008.

³⁸ Los Angeles World Airports. Sustainability Action Plan Update: BOAC July 18, 2019 Available: <https://www.lawa.org/-/media/lawa-web/lawa-investor-relations/files/additional-resources/lawa-sustainability-action-plan-update-mgmt-report-071819-2.ashx?la=en&hash=89D493ED3AAB038D0CDE307DC72BD12E9355D94F>. July 18, 2019.

³⁹ Airport Carbon Accreditation is an independent, voluntary program administered by an international consultancy (WSP), appointed by Airports Council International Europe to enforce the accreditation criteria for airports on an annual basis.

emissions by 45 percent below 1990 levels by 2025, and 80 percent by 2050. LAWA's participation in the Airport Carbon Accreditation Program and continued compliance with the LA Green New Deal, through the LAWA Design and Construction Handbook and sustainability efforts are consistent with state and local plans, policies, and regulations to reduce GHG. Thus, the Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.9 HAZARDS AND HAZARDOUS MATERIALS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			X	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

4.9.1 DISCUSSION – (A AND B)

The Proposed Project comprises partial demolition and reconstruction of an existing airport passenger concourse. Construction of the Proposed Project would involve the transport and use of hazardous materials; including diesel and gasoline, industrial solvents and cleaners, mechanical oils, and architectural coatings consistent with construction projects of similar scope and scale. These materials are not acutely hazardous, would be employed in relatively small amounts, and their storage and use are subject to the Occupational Health and Safety Act, Title 22 *Social Security* of the California Code of Regulations (Title 22), California Health and Safety Code regulations, and the LAWA Design and Construction Handbook requirements.

Additionally, previous investigations of the T4 apron area and underlying soil have produced evidence of fuel contamination concentrated around abandoned aviation fuel distribution pipeline, as described in greater detail under Section 4.9.3. Accordingly, excavation associated with the Proposed Action would likely result in the discovery

of localized contaminated soils and airfield pavement. Due to the age of portions of the T4 Concourse structure, particularly the Satellite building, lead-based paint and asbestos may be encountered during demolition as well.

In 1992 the California Department of Toxic Substance Control (DTSC) was authorized by the EPA to implement the Resource Conservation and Recovery Act (RCRA) for the State of California, thereby establishing DTSC as the primary enforcement agency for RCRA requirements in California.⁴⁰ The RCRA establishes rules and regulations to protect human health and the environment; reduce waste and promote conservation of energy and natural resources; and reduce or eliminate the generation of hazardous waste. The RCRA and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) comprise the two most prominent federal statutes with which the Proposed Project would comply. The RCRA governs the generation, treatment, storage, and disposal of hazardous wastes. CERCLA regulates cleanup of hazardous substance (excluding petroleum) release in the environment. Hazardous materials are also regulated by the CAA, the Clean Water Act (CWA), the Safe Drinking Water Act, the Hazardous Materials Transportation Act, and the Emergency Planning and Community Right to Know Act.

Applicable to the Proposed Project, the DTSC enforces regulatory requirements specified in Title 22, Division 4.5 *Environmental Health Standards for the Management of Hazardous Waste* and California Health and Safety Code Division 20 *Miscellaneous Health and Safety Provisions* and Division 37 *Regulation of Environmental Protection*.⁴¹ The DTSC provisions regulate the testing, transport, storage, and disposal of hazardous waste and hazardous substances in accordance with state and federal requirements. Additionally, construction of the Proposed Project would comply with the LAWA Design and Construction Handbook Section 01 66 13, which specifies procedures for identifying, recovering, and disposing of hazardous waste and storage and handling requirements for hazardous materials.⁴²

Compliance with existing federal, state, and local regulations and applicable BMPs would minimize the potential for accidental release of hazardous materials and ensure the appropriate response measures are in place to address an accident should one occur. Demolished materials would be tested for hazardous materials, including, hydrocarbons, asbestos, and lead-based paint, and classified for transport to an appropriate off-site facility for disposal in accordance with SCAQMD Rule 1403, the LAWA Guidance Manual for Construction Storm Water Pollution Prevention, as well as all other applicable state and federal regulations. The LAWA Guidance Manual for Construction Storm Water Pollution Prevention provides direction on minimizing or eliminating the potential for construction activity to pollute stormwater in and around a given project site. SCAQMD Rule 1403 specifies work practices to limit asbestos emissions from building demolition and renovation activities including the removal and disturbance of asbestos-containing material (ACM). This rule is generally designed to protect uses surrounding demolition or renovation activities from exposure to asbestos emissions.

Regulations to manage and control exposure to lead-based paint are described in CFR Title 29, Section 1926.62 and CCR Title 8 Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance requirements to ensure the safety of construction workers exposed to lead-based materials. In accordance with the Design and Construction Handbook, lead-based paint found during renovation or

⁴⁰ California Department of Toxic Substance Control. Resource Conservation and Recovery Act webpage Available: <https://dtsc.ca.gov/resource-conservation-recovery-act-rcra/>. Accessed October 14, 2019.

⁴¹ California Department of Toxic Substance Control. *2018 California Hazardous Waste and Hazardous Substance Law Code Excerpts*. January 2019.

⁴² Los Angeles World Airports. *2019 Design and Construction Handbook*. July 31, 2019.

demolition would require abatement by licensed contractors in accordance with EPA, Cal/OSHA, and Los Angeles County regulations.

Construction of the Proposed Project would be conducted in compliance with applicable federal, state, and local regulations for storage, use, transport, and disposal of hazardous materials and hazardous waste. Operation of the Proposed Project would be consistent with existing conditions and would, therefore, not result in a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials or create a significant hazard due to accidental release of hazardous materials or hazardous waste. The impact to public safety and the environment as a result of hazardous materials associated with the Proposed Project would be less than significant, and no mitigation is required.

4.9.2 DISCUSSION – (C)

There are no schools located or proposed within one-quarter mile of the Proposed Project. Therefore, no impacts related to hazardous emissions or handling of hazard materials, substances, or waste in proximity to an existing or proposed school would occur during construction or operation of the Proposed Project.

4.9.3 DISCUSSION – (D)

An Environmental Data Resources (EDR) database review, pursuant to Government Code Section 65962.5, was performed as part of a Hazardous Materials Assessment for the Landside Access Modernization Program (LAMP) in 2015. The EDR report includes federal, state, and local database records of properties of environmental concern, regulatory status of the facilities, and potential environmental impact to the subject site. Ten sites within or in proximity to the CTA were listed on the RCRA Generator database as large or small quantity generators; however, none of these sites were considered an environmental concern to the LAMP project, nor are any of the sites within the Proposed Project site.

Per the State of California Water Geotracker Website, which includes leaking underground storage tank (LUST) sites, cleanup assessments are underway for one site at Terminal 2 and two sites at Terminal 6. A remediation program is currently underway for the Allied Signal (Park One) facility at 9851 Sepulveda Blvd, approximately one mile east of the Proposed Project site⁴³. None of the Airport sites identified on GeoTracker would impact construction or operation of the Proposed Project. There are no sites within or adjacent to the Proposed Project site that were determined to represent potential environmental concerns for the project per federal or state databases⁴⁴.

The EDR review was supplemented by site assessment documents specific to T4, which identify instances of known total petroleum hydrocarbon (TPH) contamination related to the previous T4 aviation fuel hydrant system. Soil investigations within the T4 apron were performed in 2003 and 2004, during a series of maintenance projects associated with the aviation fuel hydrant system, and in 2011 prior to replacement of the fuel hydrant system. TPH contamination has been verified at several locations within the T4 apron immediately adjacent to the abandoned fuel hydrant and pipeline locations within the apron pavement.⁴⁵ The vertical and lateral extents of the contamination have been recorded and the sources of previous contamination (old hydrant pits) have been removed. A minimum of 20 feet of clean soil exists between the impacted soil and shallow groundwater below T4; therefore, remediation of impacted soils beneath and in the vicinity of T4 was determined to be unwarranted.

⁴³ California State Water Resources Control Board. GeoTracker Map. Accessed September 17, 2019

⁴⁴ Ninyo & Moore. Hazardous Materials Assessment for the Landside Access Modernization Program. September 9, 2015.

⁴⁵ Arcadis. Terminal 4 Fuel Hydrant Line Abandonment, Los Angeles International Airport, Los Angeles, California. June 21, 2012.

The Proposed Project would require excavation within portions of the T4 apron and T4 Concourse and relocation of multiple fuel hydrant pits. Based on previous soil investigations of the T4 apron, it is likely localized contaminated soils would be encountered during demolition and construction activity. Compliance with federal and state regulations and the LAX Rules and Regulations would be required during construction of the Proposed Project. For any release of hazardous waste or hazardous constituents, the human health risk assessment calculations and corrective action would comply with Title 22, Sections 69021 and 69022. Treatment, storage, and disposal of hazardous waste, including contaminated soils and groundwater, would be conducted in compliance with Title 22, Section 66262. Additionally, any required soil or groundwater remediation would be done in accordance with the EPA's BMPs for Soil Treatment Technologies. Compliance would require preparation of detailed response plans for contaminated soil encountered during construction, as well as preparation of health and safety and soil management plans to ensure excavated soils are tested, segregated, and disposed of in accordance with applicable state and federal regulations per the *Environmental Procedures* (Section 01 35 43) identified in the LAWA Design and Construction Handbook. Previous investigations of the fuel hydrant system at LAX have verified contamination in the immediate vicinity of abandoned hydrant fuel pipelines with limited migration. Due to the limited amount of known soil contamination and extent of previous investigation, it is unlikely excavation activity for the Proposed Project would result in the exposure of significant quantities of contaminated soil or groundwater.

Remediation of contamination has the potential to expose workers to hazardous materials. Development and approval of a plan for removal of volatile organic compounds (VOCs) are required under SCAQMD Rule 1166.⁴⁶ Provisions for worker health and safety would be mandated by and regulated through OSHA and Cal/OSHA, which include exposure limits for construction staff, identification of proper protective equipment, training guidance, and emergency and medical response requirements.

Compliance with EPA BMPs and federal, state, and local regulatory requirements governing remediation of contaminated materials would ensure that construction and operation of the proposed project on a site with known contaminants would not create a significant hazard to the public or the environment. Impacts associated with the Proposed Project's creation of hazards to the public or the environment would be less than significant.

4.9.4 DISCUSSION – (E)

The Proposed Project would be located within a large hub commercial airport. LAX must operate in compliance with federal, state, and local laws and regulations that ensure Airport activities minimize the potential for impacts to the public and the environment. FAA design guidelines and the City of Los Angeles Ordinance No. 132,319 regulate building heights within and adjacent to the Airport to eliminate obstacles that may interfere with aircraft operations. Additionally, the City of Los Angeles land use and zoning regulations ensure planned and existing uses adjacent to the Airport are consistent with Airport operations. All construction activities would comply with applicable aviation-related safeguards, including FAA construction coordination and vetting requirements (14 CFR Part 77), and would, therefore, not create any safety hazard. The proposed improvements would be constructed below applicable FAA navigational surface thresholds and would, therefore, not result in an operational safety hazard. Construction activity would not substantially increase ambient noise at LAX due to the high ambient noise levels associated with Airport operations. Operation of the Proposed Project would not result in any significant changes to aircraft procedures on the AOA, increase the number of aircraft operations at LAX, or otherwise result in a change to the noise contours within and adjacent to LAX associated with the regular operation of aircraft. Impacts

⁴⁶ SCAQMD Rule 1166, Available: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4>

to safety for people residing near or working in or near the Proposed Project area would be less than significant and no mitigation is required. For discussion of noise, please see Section 4.13.

4.9.5 DISCUSSION – (F)

LAWA and tenants of LAX maintain emergency response and evacuation plans to minimize the potential for and the effects of an accident or other emergency. Construction of the Proposed Project is not anticipated to result in any closures to local Airport circulation roads or lanes within the CTA. During construction, emergency access routes to and from the Proposed Project site would remain open per FAA Advisory Circular (AC) No. 150/370-10H, State Fire Code Part II – *General Safety Provisions*, and Chapter 33 - *Fire Safety During Construction and Demolition* of Los Angeles City Fire Code regulations. Following construction of the Proposed Project, operation of T4 would generally be consistent with existing conditions. The Proposed Project would not result in an increase in passengers or number of aircraft served at the terminal.

Emergency access to and response plans for T4 would be updated, and potentially enhanced, based on the new structure and associated safety systems in accordance with the California Building Standards Code, Part II - *General Safety Provisions*, of the California Fire Code and Chapters 5-11 and 20 of the Los Angeles City Fire Code. The construction staging areas would comply with LAWA Design and Construction Handbook and FAA AC 150/5370-10 guidelines and procedures to limit the impacts of construction at the Airport, including the potential to affect emergency response. Per the LAWA Design and Construction Handbook, the contractor would be required to produce and adhere to a Site Logistics Plan, which would specify emergency vehicle access provisions and evacuation routes, and provide formal Emergency Instructions upon completion of construction identifying the types of emergencies that could affect the improved T4 Concourse and methodology for addressing the systems and structures associated with each emergency type.⁴⁷ An Emergency Contractor Quality Control Program, including a laydown plan, would be suggested in accordance with Part 2 - *General Construction Items*, to support adherence to pertinent NFPA requirements associated with specific material and activity regulations identified in FAA AC 150/5370-10 would be required. Construction staging activity would not affect emergency plans for or access to surrounding land uses. Therefore, impacts to emergency response or evacuation plans related to the proposed construction activity would be less than significant. The Proposed Project would construct T4 to modern fire, building, and seismic code standards, thereby improving operational safety at and adjacent to T4. Ongoing operation of the Proposed Project would not impact emergency response or evacuation plans and may ultimately enhance human safety at T4.

4.9.6 DISCUSSION – (G)

The Proposed Project site is located within a developed airport and surrounded immediately by other airport uses on the airfield or within the CTA. Beyond the Airport are urbanized uses, to the north, south, and east, and the Pacific Ocean to the west. There are no fire hazard areas containing flammable brush, grass, or trees present on or near the Proposed Project site. Furthermore, the project site is not within a City of Los Angeles Wildfire Hazard Area, as delineated in the Safety Element of the General Plan.⁴⁸

⁴⁷ Los Angeles World Airports. 2019 Design and Construction Handbook. July 31, 2019.

⁴⁸ City of Los Angeles. Safety Element of the City of Los Angeles General Plan: Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles. April 1996.

4.10 HYDROLOGY/WATER QUALITY

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of a site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner that would:			X	
(i) Result in substantial erosion or siltation on- or off-site;			X	
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;			X	
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
(iv) Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

4.10.1 DISCUSSION

The Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The Clean Water Act (CWA) requires that any discharge of pollutants to waters of the United States from any point source comply with a National Pollutant Discharge Elimination System (NPDES) permit. In 2001 (and since amended), the Los Angeles Regional Water Quality Control Board (LARWQCB)⁴⁹ issued NPDES Permit No. CAS004001 which covers the majority of Los Angeles County, including the Airport.⁵⁰ Additionally, construction activities at the Airport are subject to the requirements of the State

⁴⁹ California Water Boards, Los Angeles Regional Water Quality Control Board, <https://www.waterboards.ca.gov/losangeles/> (accessed August 14, 2019).

⁵⁰ California Regional Water Quality Control Board, Los Angeles Region, *Order No. 01-182, NPDES Permit No. CA004001*. https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/ms4_permits/los_angeles/2001-2007/LA_MS4_Permit2001-2007.pdf

Construction General Permit (State Water Resources Control Board [SWRCB] Order No. 2009-0009-DWQ),⁵¹ which lists the requirements for the protection of surface water quality during construction activities involving more than one acre of ground disturbance.

Any project that disturbs an area of more than one acre requires a Notice of Intent (NOI) to discharge under the General Permit for Construction and preparation of a project-specific SWPPP. The SWPPP includes measures to eliminate or reduce pollutant discharges and describes the implementation and maintenance of BMPs to control stormwater and other runoff during and after construction. The SWPPP is required to include a menu of BMPs to be selected and implemented based on the phase of construction and the weather conditions to effectively control erosion, sediment, and other construction related pollutants to meet the best available technology economically achievable and best conventional pollutant control technology standards. Erosion control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. The SWPPP for the Proposed Project would be developed in accordance with LAWA's Guidance Manual for Construction Storm Water Pollution Prevention to ensure compliance with the Construction General Permit.⁵² Additionally, activities and potential pollutant discharges associated with operations at the Airport are regulated by the State Industrial General Permit (SWRCB NPDES Order No. CAS000001).⁵³ LAWA currently has a SWPPP that addresses industrial activities at the Airport.⁵⁴

Given that the existing Proposed Project site is fully developed with structures and impervious surfaces, the Proposed Project would not result in a substantial increase in the amount of impervious surface on the Proposed Project site nor would the Proposed Project rely on or otherwise impact groundwater sources. Therefore, the Proposed Project would not substantially decrease groundwater supplies or interfere with groundwater recharge.

The Proposed Project is not located near any streams or rivers, and the site is currently fully covered with structures and impervious surfaces. Implementation of the Proposed Project would not alter drainage patterns of the site; would not result in substantial erosion of siltation on- or off-site; would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site; would not create or contribute runoff water which would exceed the capacity of existing storm water drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.

The Proposed Project site is not located within a floodplain per Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map data.⁵⁵ A majority of LAX property, including the Proposed Project site and the

⁵¹ California State Water Resources Control Board, National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction and Land Disturbance Activities, Adopted Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ, NPDES No. CAS000002, July 17, 2012. https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

⁵² City of Los Angeles, Los Angeles World Airports, *Guidance Manual for Construction Storm Water Pollution Prevention*, November 2015. <https://www.lawa.org/-/media/lawa-web/environment/files/final-master-lawa-guidance-manual.ashx?la=en&hash=CCD2CA149DAEEA1E8E4DD4A419A0FD7340CA87DD>

⁵³ California State Water Resources Control Board, *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities*, Adopted Order No. 2014-0057-DWQ, NPDES No. CAS000001, Adopted April 1, 2014 and Amended August 4, 2015. https://www.waterboards.ca.gov/water_issues/programs/stormwater/igp_20140057dwq.shtml

⁵⁴ City of Los Angeles, Los Angeles World Airports, *Storm Water Pollution Prevention Plan (SWPPP) Associated with Industrial Activities for Los Angeles International Airport*, January 18, 2018.

⁵⁵ Federal Emergency Management Agency, Flood Insurance Rate Map No. 06037C176OF, September 26, 2008.

surrounding CTA, is designated Flood Zone X, which FEMA defines as an area of “minimal flooding.” T4 is outside of a Special Flood Hazard Area and the 100-year flood zone. The Proposed Project site is approximately 1.85 miles from the Pacific Ocean and is not delineated as a potential inundation or tsunami impacted area on the City of Los Angeles Inundation and Tsunami Hazard Areas map.⁵⁶

Implementation of the Proposed Project would comply with the existing regulatory programs and requirements designed to meet water quality standards and water discharge requirements. Based on compliance with these requirements, the Proposed Project would not conflict with or obstruct the implementation of applicable water quality control plans and regulations. Additionally, the Proposed Project would not rely on or otherwise impact groundwater supplies or result in a substantial increase in the amount of impervious surface at the site. Therefore, the Proposed Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. Impacts under thresholds (a) through (e) would be less than significant.

4.11 LAND USE AND PLANNING

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

4.11.1 DISCUSSION

The implementation of the Proposed Project would not disrupt or physically divide an established community. The Proposed Project site is located entirely within existing Airport property, and no acquisition of additional property would be required.

The implementation of the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. According to the City of Los Angeles Department of City Planning, the existing zoning for the Proposed Project site is LAX Zone.⁵⁷ Land use designations and development regulations applicable to the Airport include the LAX Plan, the LAX Specific Plan, and the Los Angeles County Airport Land Use Plan. The Proposed Project’s relationship to these plans is described below:

- The LAX Plan⁵⁸ is a component of the City of Los Angeles General Plan. The LAX Plan promotes, “an arrangement of airport uses that encourages and contributes the modernization of the airport...” According to the LAX Plan,

⁵⁶ City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994. <https://planning.lacity.org/cwd/gnlpln/safteyelt.pdf>

⁵⁷ City of Los Angeles, Department of City Planning, ZIMAS, <http://zimas.lacity.org/> (accessed August 29, 2019).

⁵⁸ City of Los Angeles, Department of City Planning, *Los Angeles International Airport, LAX Plan*, 2004. https://www.lawa.org/-/media/lawa-web/lawa-our-lax/finallaxplan_092904.ashx

the Proposed Project site is located in areas zoned for Airport Airside. In Airport Airside zones, development shall “Develop a balanced airfield to provide for more efficient and effective use of airport facilities,” among other items. The construction and implementation of the Proposed Project would not change the existing use of the Proposed Project site and would modernize and improve the efficiency of the existing facility, and therefore, would be consistent with this document.

- The LAX Specific Plan⁵⁹ provides zoning and development regulations for the Airport. According to the LAX Specific Plan, the Proposed Project site is located in the LAX Zone and Airport Airside subarea. The construction and implementation of the Proposed Project would not change the existing use of the Proposed Project site, and therefore, would be consistent with this document.
- The Los Angeles County Airport Land Use Plan⁶⁰ is intended to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public use airports. The construction and implementation of the Proposed Project would not change the existing use of the Proposed Project site or Airport operations, and therefore, would not conflict with this document.

The land use and zoning designation for the Proposed Project site would not change, and land uses would remain unchanged.

⁵⁹ City of Los Angeles, *Los Angeles International Airport (LAX) Specific Plan, Ordinance No. 176,345*, September 11, 2017 (Amended).

⁶⁰ Los Angeles County, Airport Land Use Commission, *Los Angeles County Airport Land Use Plan*, December 19, 1991, revised December 1, 2014. http://planning.lacounty.gov/assets/upl/data/pd_alup.pdf

4.12 MINERAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

4.12.1 DISCUSSION

The Proposed Project site is developed with airport-related uses. The site is paved or covered with buildings. There are no actively mined mineral or timber resources on or near the Proposed Project site, nor is the site available for mineral resource extraction given the existing land uses.

4.13 NOISE

WOULD THE PROJECT RESULT IN:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?				X

4.13.1 DISCUSSION

The Proposed Project involves the modernization of the existing Terminal 4 Concourse and adjacent apron area. The Proposed Project site is within a large-hub international airport with existing sources of significant noise, including aviation and traffic noise. The Proposed Project would result in a temporary increase of noise and vibration levels at the project site during construction as a result of operation of construction equipment. Measurable increases in construction related traffic noise vary depending on the traffic conditions of the roadway, ambient noise within and around the project site, and type of construction equipment. For planning and preliminary analysis purposes, a traffic and transportation technical study was conducted in part to determine the likelihood of construction traffic-related impacts (see **Attachment 2**).

The Proposed Project construction haul routes are on roadways with traffic conditions operating at a level of service A or B (see Attachment 2 for greater detail). Under these conditions sound levels increase at a rate of 3 dBA per doubling of traffic volume. Based on estimated increases in traffic volume due to construction, noise impacts from construction-related traffic would be minimal (less than 3 dBA) and would be consistent with the existing noise environment. Construction equipment noise levels vary by equipment type, but typically range from approximately 69 dBA up to 95 dBA at 50 feet. In comparison, a typical aircraft jet engine, with which most commercial aircraft are equipped, produce noise levels of up to 140 dBA at a distance of 100 ft.⁶¹ The Proposed Project site is within the Airport's 75 dBA community noise equivalent level (CNEL) contour, which is the average noise level over a 24-hour period.⁶² The use of construction equipment would be used on a temporary and intermittent basis, would not result in substantial increases to the noise environment, and would be consistent with existing noise levels at the Airport and surrounding roadways.

Some aircraft would temporarily operate at gates at MSC, TBIT, or T5 during Project construction. All of these gates lie within the 75 dBA CNEL contour. Potential aircraft taxiway noise effects that could result from shifting aircraft operations from other terminals to the MSC was analyzed as part of the MSC EIR⁶³, and found to be less than significant assuming aircraft operations at 11 gates at MSC. The Proposed Project would temporarily shift operations from up to 7 gates to MSC; based on the analysis contained in the MSC EIR, the shift in aircraft operations would not result in a significant increase in aircraft taxi noise.

Noise levels from outdoor construction activities, independent of background ambient noise levels, indicate that the noisiest phases of construction are typically during excavation and grading, and that the noise level from equipment with mufflers is typically 86 dBA⁶⁴ L_{eq} ⁶⁵ at 50 feet from the noise source. As described in Section 4.1.2.4 of the LAX Master Plan EIR, this type of sound typically dissipates at a rate of 4.5 dBA to 6.0 dBA for each doubling of distance. Using a conservative attenuation rate, a sound level of 86 dBA at 50 feet from the noise source would be approximately 81.5 dBA at a distance of 100 feet, 77 dBA at a distance of 200 feet, and so on. That sound drop-off rate does not take into account any intervening shielding or barriers such as structures or hills between the noise source and noise receptor.

Construction of the Proposed Project would occur in an area generally removed from the communities near LAX. The nearest noise-sensitive land use is residential development approximately 3,000 feet to the south in El Segundo. Based on a noise attenuation rate of 4.5 dBA per doubling of distance, the noise levels from construction activities within the T4 Project site would be approximately 59.2 dBA L_{eq} at the residential area in El Segundo. The existing daytime ambient noise level at the nearest sensitive receptor (i.e., residential development in El Segundo south of Imperial Avenue) is between approximately 65 and 70 dBA L_{eq} ,⁶⁶ with the nighttime ambient noise level being

⁶¹ Yale University. Decibel Level Comparison Chart Available: <https://ehs.yale.edu/sites/default/files/files/decibel-level-chart.pdf>. October 16, 2019.

⁶² Los Angeles World Airports. California State Airport Noise Standards Quarterly Report (2Q19) for Los Angeles International Airport. July 31, 2019.

⁶³ City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report, Los Angeles International Airport (LAX) Midfield Satellite Concourse*, June 2014.

⁶⁴ dBA: A-weighted decibels are an expression of the relative loudness of sounds as perceived by the human ear.

⁶⁵ L_{eq} (Equivalent Noise Level) is a measure used to express the average sound level (typically expressed in dBA) over a given period of time.

⁶⁶ City of Los Angeles, Los Angeles World Airports (LAWA), LAWA Noise Management, *California State Airport Noise Standards Quarterly Report. 3Q11*, available at: [http://lawa.org/uploadedFiles/LAX/pdf/lax3Q11 noise contour map.pdf](http://lawa.org/uploadedFiles/LAX/pdf/lax3Q11%20noise%20contour%20map.pdf). Accessed on August 27, 2012.

approximately 5 dBA lower. Thus, the noise level from construction activity would be below the ambient noise levels. The CEQA threshold for a significant impact is a 5 dBA increase over ambient noise levels.

Construction staging for the Proposed Project would occur on the Project site and on Airport property between Westchester Parkway and Lincoln Boulevard, approximately 0.8 miles northeast of the Proposed Project site, and at the intersection of South La Tijera Boulevard and Westchester Parkway, approximately 1 mile northeast of the Proposed Project site. Based on a typical mix of construction equipment anticipated to be used for the Proposed Project, noise levels at the construction staging areas would be expected to be approximately 69 dBA L_{eq} . Noise levels associated with construction traffic parking at these sites would be lower.⁶⁷ These noise levels would not exceed ambient noise levels by 5 dBA or more at a sensitive noise use. Based on the existing ambient noise levels of an active airfield and the distance to sensitive receptors, it is not anticipated that noise generated from construction of the Proposed Project would result in a substantial temporary increase in ambient noise levels, or excessive ground-borne vibration or noise.

Operation of the Proposed Project would not generate any additional noise, nor would it result in an increase aircraft or passenger capacity at LAX. Therefore, implementation of the Proposed Project would not: expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; expose people to or generate excessive groundborne vibration or groundborne noise levels; create a substantial permanent increase in ambient noise levels in the Proposed Project site vicinity above levels existing without the Proposed Project; or, create a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing. The impact is less than significant.

4.14 POPULATION/HOUSING

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

4.14.1 DISCUSSION

Implementation of the Proposed Project would not induce substantial unplanned population growth in any area, either directly or indirectly, or displace substantial numbers of existing people or housing. There are no existing residential properties at the Proposed Project site, and the Proposed Project does not include any residential development. The renovated and/or reconstructed Terminal 4 would contain existing and similar business operations that exist today.

⁶⁷ City of Los Angeles, Los Angeles World Airports (LAWA), [Final Environmental Impact Report, Los Angeles International Airport \(LAX\) Bradley West Project](#), Section 4.8, September 2009.

According to the construction traffic analysis conducted as part of the evaluation of the Proposed Project, the Proposed Project would create approximately 100 new jobs during peak construction; however, the number of jobs created over the full construction period would likely be more than those created during peak construction. While the construction and implementation of the Proposed Project would generate jobs, it is expected that these jobs would be filled using local labor and would not require workers to relocate. Furthermore, given that construction of all Proposed Project elements is assumed to begin in 2021 and be completed by 2026, the construction jobs created would be temporary in nature. Due to the employment patterns of construction workers in Southern California and the size of the Southern California labor force, construction workers are not likely to relocate. The construction and operation of the Proposed Project would not result in any increase in population; therefore, no impact would occur.

4.15 PUBLIC SERVICES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i. Fire protection?				X
ii. Police protection?				X
iii. Schools?				X
iv. Parks?				X

4.15.1 DISCUSSION (I AND II)

The City of Los Angeles Fire Department (LAFD) provides fire protection services throughout LAX. Four fire stations are located at LAX; Fire Station Nos. 5, 51, 80, and 95. Fire Station Nos. 80 and 51 are airfield rescue and fire fighting (ARFF) facilities, which are built on and have direct access to the air operations area (AOA). Fire Station Nos. 5 and 95, 0.92 miles north and 1.45 miles east of T4 respectively, are not adjacent to the AOA. Access to the Proposed Project site would be maintained throughout construction and construction activities would not impede fire response access to adjacent areas of the AOA and CTA in accordance with FAA Advisory Circular 150/5370-2F, Operational Safety on Airports During Construction. The Proposed Project would comply with all applicable LAVA, City, state, and federal fire codes and ordinance. The T4 Modernization Project would not increase operational capacity of the Airport and the improvements would serve passenger and air traffic levels in a manner and location consistent with the existing T4 Concourse. The Proposed Project would not alter emergency access routes or increase the number of facilities at LAX that would require fire protection. As discussed in Section 2.2, the Proposed Project would replace existing facilities and utilities with modern facilities and equipment which are constructed to modern building and fire code requirements, thereby improving safety in comparison to the existing structures.

Improvements would include upgrades to the storm drain system, which will include modifications to the slopes surrounding the T4 Concourse, and relocation and replacement of inlets to meet current National Fire Protection Association requirements.⁶⁸ The Proposed Project would be built in accordance with LAX Design Guidelines and would meet requirements for LEED® Silver certification. Therefore, the Proposed Project would have no impact on fire safety provisions at LAX.

The Los Angeles World Airports Police Division, the City of Los Angeles Police Department LAX Detail, and the Los Angeles Police Department provide police service at LAX and the surrounding areas. Demand for on-airport police service is typically based on passenger levels and number of facilities requiring coverage. The Proposed Project would not result in an increase in passengers at LAX and the increased in facility space resulting from the proposed improvements would be relatively minor. Construction of the Proposed Project would be completed in accordance with applicable federal, state, and local regulations and would not inhibit police access to the T4 Concourse or the adjacent AOA. As with fire protection services, the Proposed Project would not alter emergency access or increase the number of buildings at LAX that would require police coverage. Therefore, the Proposed Project would have no impact on police and emergency response service at LAX.

4.15.2 DISCUSSION (III AND IV)

The proposed Project would renovate and reconstruct portion of an existing terminal facility at LAX. Construction and operation of the proposed Project would not induce population growth in the area that would require new schools or parks, nor would construction or operation of the Proposed Project impact service rates or availability of schools or parks.

4.16 RECREATION

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				X

4.16.1 DISCUSSION

The Proposed Project does not include development of recreational facilities nor would it provide improved access to existing public recreation areas. Further, the Terminal 4 Modernization Project would not cause any increase in the use of existing neighborhood and regional parks or other recreational facilities or require the construction or expansion of recreational facilities. Thus, the Proposed Project would have no impact on recreation.

⁶⁸ National Fire Protection Association, *NFPA 415 Standard on Airport Terminal Buildings, Fueling Ramp Drainage, and Loading Walkways*, 2016.

4.17 TRANSPORTATION

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

4.17.1 DISCUSSION (A)

Construction associated with the Proposed Project would generate traffic associated with workers traveling to and from the construction employee parking areas and staging areas, truck haul/delivery trips, and miscellaneous construction-related travel. Delivery of materials would be scheduled to reduce disruptions to the local surface transportation network. No closures of roadways within the local surface transportation network, transit stops, or bicycle and pedestrian facilities are proposed during construction. Peak construction traffic would result in approximately 428 daily construction trips on the local surface transportation network, approximately 78 of which would occur during the a.m. or p.m. commuter peak period. Further, surface network intersections that are included in the construction haul and delivery routing currently perform at level of service B or better. Due to the temporary nature of increased traffic associated with the Proposed Project and the relatively low number of trips added to the local transportation system as a result of construction and construction worker traffic, a vehicle miles traveled (VMT) analysis was not performed for the Proposed Project. Additionally, significant impacts associated with an increase in VMT are generally associated with land use-specific trips generated following construction. Projects that do not increase the number of trips or would be constructed within one-half mile of a major transit stop should be presumed to result in a less than significant impact per Section 15064.3 of the CEQA Statute and Guidelines. The Proposed Project would not increase the Airport's operational capacity as the proposed improvements would replace an existing terminal building with an updated structure of similar scale and the same capacity. The Proposed Project would not conflict with, or otherwise have an impact on, any local transit, transportation, bicycle, or pedestrian plan or ordinance.

The Proposed Project would comply with LAWA's Design and Construction Handbook, which requires construction site logistics plans be developed to identify construction staging areas, employee parking lots, haul routes, and scheduling. Additionally, the Proposed Project would comply with LAX Master Plan commitments to establish construction worker commute and shift times that avoid contributing to peak period traffic and moderate haul- and delivery-related traffic. The Proposed Project would not increase operational traffic at the Airport or on local surface roads and would otherwise comply with local transportation plans and policies; therefore, the Proposed Project would have no impact.

4.17.2 DISCUSSION (B)

On December 28, 2018, the California Natural Resources Agency, the Office of Planning and Research (OPR), and the Office of Administrative Law approved amendments to the CEQA Guidelines, including the Initial Study Checklist. These revisions were based in part to Senate Bill 743 [2013], which stated in part "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division..." In response to this directive, changes were made to the CEQA Guidelines Appendix G impact checklist questions. Given the recent changes in CEQA and absence of an increase in operational traffic negates the need for LADOT or Los Angeles County project-specific traffic analysis; however, for planning purposes LAWA prepared a construction traffic study for the proposed projects (see Attachment 2).

The Proposed Project would not result in an increase in the number of passengers at LAX and would be constructed at the existing CTA, served by the existing surface transportation network. Therefore, no operational increase in VMT would be attributable to the Proposed Project.

Subsequent to the approval of the LAX Master Plan, LAWA established the Coordination and Logistics Management (CALM) team. Working in cooperation with LAWA staff including Terminal Operations, Airport Police, Capital Programming & Planning Group, and Commercial Development Group, the CALM team monitors construction traffic, coordinates land and roadway closures and analyzes traffic conditions it determine the need for additional traffic controls, lane restriping, and traffic signal modifications. This also includes preparation of traffic control plans for both vehicular and pedestrian related transportation. Per LAWA Design and Construction Handbook requirements, the Proposed Project would require construction worker shifts to begin and end in off-peak hours to avoid contributing to local a.m. and p.m. peak hour traffic levels. Additionally, construction contractors would be required to coordinate haul and delivery trips and route construction traffic in a manner that reduces contributions to the local surface transportation network and avoids residential streets and other sensitive receptors to the extent feasible. The avoidance and minimization measures required by LAWA were included in the assumptions for the traffic and transportation analysis associated with the Proposed Project.

The Proposed Project would not substantially increase the number of trips to or from the Airport or increase traffic volume on local roads. Based on the Southern California Association of Governments Transit Priority Area 2045 Map, the Proposed Project and the associated construction materials staging areas are within one half-mile of major transit stops.⁶⁹ Per Section 15064.3 of the State CEQA Statute and Guidelines, projects within one-half mile of an existing transit stop should be presumed to cause a less than significant transportation impact. Construction workers are expected to be hired from local labor pools and would not induce growth in the area that would result in an increase in VMT due to construction. Construction activity associated with the Proposed Project would not require road closures or otherwise reroute local traffic in a manner that would result in an increase in VMT. The Proposed Project would have a temporary and less than significant impact on traffic with regard to traffic levels on local roads and intersections and vehicle miles traveled.

⁶⁹ Southern California Association of Governments. SCAB GIS Open Data Portal Available: <http://gisdata-scag.opendata.arcgis.com/>. Accessed October 16, 2019.

4.17.3 DISCUSSION (C AND D)

The Proposed Project would not include the modification of any existing on-airport roadways, parking systems, remote parking facilities, transit systems, or pedestrian and bicyclist activities, nor would it modify off-airport transportation operations. The improved T4 Concourse would operate in the same location, and in the same manner, as the existing T4 Concourse and would, therefore, not increase hazards due to a geometric design feature. The Proposed Project would be constructed at the existing T4 Concourse and associated apron area. During construction, emergency access routes to and from the Proposed Project site would remain open per FAA Advisory Circular (AC) No. 150/370-10H, State Fire Code Part II – *General Safety Provisions*, and Chapter 33, *Fire Safety During Construction and Demolition*, of Los Angeles City Fire Code regulations. Following construction of the Proposed Project, operation of T4 would generally be consistent with existing conditions. No road closures would be required as a part of the Proposed Project and, therefore, emergency access to T4 and the larger CTA would remain as it currently exists. The Proposed Project would have no impact with regard to creating a hazard to traffic or transportation or availability of emergency access.

4.18 TRIBAL CULTURAL RESOURCES

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).				X
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

4.18.1 DISCUSSION

There is no record or evidence of unique archaeological resources or known tribal cultural resources being located at or near the Proposed Project site. In compliance with AB 52, LAWA has coordinated with all Native American tribes that have notified the Native American Heritage Commission they have a tribal interest in the vicinity of LAX. The San Gabriel Band of Mission Indians is the only Native American tribe that has requested LAWA notify them of

regarding planned and potential Airport improvement projects. LAWA has notified the San Gabriel Band of Mission Indians of the proposed T4 Modernization Project, in accordance with the consultation request from the tribe.⁷⁰

Given that the existing Proposed Project site is fully developed with structures and impervious surfaces, and the absence of cultural and archeological resources within or near the Proposed Project site, the Proposed Project is unlikely to affect tribal cultural resources. As discussed in Section 4.5.2 above, LAWA has developed and adopted plans, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's ATP. These plans, policies, and procedures include notification of the Native Heritage Commission (NAHC) and retention of a Native American monitor if/as recommended by NAHC if a unique Native American archaeological resource, Tribal Cultural Resource, or human remains are encountered during construction. LAWA requires all construction projects at LAX to comply with the ATP and will apply this requirement to the Proposed Project. The likelihood for encounter any such resources is low, and these existing measures would ensure that if any unanticipated resources are encountered, impacts would remain less than significant.

4.19 UTILITIES/SERVICE SYSTEMS

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

4.19.1 DISCUSSION (A)

The existing T4 facility is antiquated and would be partially demolished and reconstructed in place to continue service as an Airport terminal. Certain utility components connected to T4 would be replaced with modern equivalents. Standby power utility infrastructure would be installed to support air carrier emergency operations, meet LAWA Design and Construction Handbook requirements, and support life safety systems.

⁷⁰ LAWA submitted a letter to the San Gabriel Band of Mission Indians on October 8, 2019 as notification of the Proposed Project and as an opportunity for tribal monitoring coordination.

Upgrades to the fire and domestic water system will ensure adequate capacity and flow rates to ensure the system is able to serve the facility. Improvements will include connecting the fire water loop at T4 to upgraded fire water loops in the Central Terminal Area (CTA). Upgrades to the storm drain system will include modifications to the slopes surrounding the T4 Concourse and relocation and replacement of inlets to meet current National Fire Protection Association 415⁷¹ requirements. New service connections from T4 will be constructed to connect to the existing sanitary sewer system and oil/water separators will be installed. Modifications to the natural gas system will be made to correspond to the new configuration and size of building components. However, the physical construction activities associated with these new utilities have been accounted for as part of the proposed project in the individual resource sections of this Initial Study. Impacts would be less than significant

4.19.2 DISCUSSION (B-D)

The Proposed Project would not result in an increase in passengers or significant change in number of employees at LAX. Therefore, no significant increase in the immediate or future demand for potable water, wastewater treatment service, or solid waste would occur during operation of T4. A minimum of 75 percent of solid waste created during construction of the Proposed Project would be collected and diverted, in accordance with the LAX Sustainable Design & Construction Requirements document.⁷² Materials used in the construction of the Proposed Project would also comply with the LAX Sustainable Design & Construction Requirements, including a minimum amount of local and recycled materials. Design and construction phases would implement strategies to increase energy efficiency, actively and passively, and to reduce waste. The Proposed Project would also be subject to Los Angeles Green Building Code Tier 1 conformance requirements, the City’s Low Impact Development Ordinance, and any requirements the design team uses to achieve LEED® Silver certification.

The Airport and T4 tenant businesses would also continue to participate in the LAWA Recycling program. The Countywide (Los Angeles) Integrated Waste Management Plan 2017 Annual Report verified Los Angeles County has approximately 15 years of landfill capacity at existing landfill facilities. Given the high diversion rate of construction and operational solid waste diversion, the Proposed Project would have a less than significant impact on the local solid waste disposal capacity and, in compliance with LAX sustainability goals, would meet local and state solid waste reduction, recycling, and diversion statutes and regulations. The proposed improvements would likely reduce demand on utilities and public service systems at the Airport, as identified in Section 4.6. The Proposed Project would not result in an increase in passengers or aircraft operations that would, in turn, increase the production of solid waste at T4. Therefore, the Proposed Project would have a less than significant impact on utilities and service systems.

4.20 WILDFIRE

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to,				X

⁷¹ National Fire Protection Association, *NFPA 415 Standard on Airport Terminal Buildings, Fueling Ramp Drainage, and Loading Walkways*, 2016.

⁷² Los Angeles World Airports. *Los Angeles International Airport Sustainable Design & Construction Requirements*. August 4, 2017.

	pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	X
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	X

4.20.1 DISCUSSION

The Proposed Project would be constructed on previously developed Airport property, within which the risk of wildfire is extremely limited due to absence of unpaved surfaces. The Proposed Project site is not within or near a state responsibility area or lands classified as Tier 2 – Elevated or Tier 3 – Extreme Hazard Zone per the California Public Utilities Commission Fire Map. Neither construction nor operation of the Proposed Project would substantially impair an adopted emergency response plan or emergency evacuation plan. The Proposed Project would have no impact on wildfires or the risks associated with wildfires.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

WOULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?			X	
b) Have impacts that would be individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?			X	

4.21.1 DISCUSSION – (A)

The proposed Terminal 4 Modernization Project would comprise the partial demolition and reconstruction of an existing airport terminal facility at LAX. The proposed improvements would occur on previously developed Airport property. No sensitive species or habitat exist within or in proximity to the Proposed Project site. Construction of the Proposed Project would result in impact to the environment; however, those impacts have been determined to be temporary and less than significant and would not affect any fish, wildlife, or native plant species. Operation of the Proposed Project would constitute a continuation of existing uses at the T4 Concourse and, therefore, result in a less than significant impact to the environment. The Proposed Project would be constructed in the same location as the existing T4 Concourse, which is devoid of any cultural, archaeological, or historic resources. Operation of the

Proposed Project may result in a reduction on emissions and other pollutants and more efficient use of resources at T4. The Proposed Project would help LAWA and the greater Los Angeles Metropolitan Area achieve short term environmental goals; however, those goals would not be achieved to the detriment of long-term environmental goals of the Airport or the region. Long-Term environmental goals would also be achieved through reduction of emissions and reduced demand on resources at T4. Therefore, the Proposed Project would not impact any site associated with notable historic or prehistoric events or cultures.

4.21.2 DISCUSSION – (B)

Implementation of the Proposed Project would largely be restricted to the T4 Concourse. The majority of T4 gates would remain open throughout construction to reduce operational impacts on other boarding areas and maintain a minimum level of service for passengers. All impacts that could occur as a result of the Proposed Project were determined to be less than significant. BMPs and avoidance and minimization measures would be implemented to reduce the potential for cumulatively significant impacts to occur as a result of the Proposed Project in combination with other existing and future on-and off-Airport construction projects. Due to the limited nature of the impacts the Proposed Project may have on the environment, the methods by which the Project would be constructed and operated, and the location of the Proposed Project, the Proposed Project, when considered cumulatively with other on- and off-Airport construction projects, would result in a less than significant impact to the environment.

4.21.3 DISCUSSION – (C)

Implementation of the proposed T4 Modernization project would necessarily comply with federal, state, and local regulations to ensure construction and operation of the Proposed Project would not significantly impact human health and safety. Analysis determined that all potential impacts associated with the Proposed Project would be less than significant with implementation of the BMPs and avoidance and minimization measures detailed in the Initial Study.

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