
4. ENVIRONMENTAL IMPACT ANALYSIS

This chapter presents an assessment of the potentially significant environmental impacts of the proposed project, as described in Chapter 2, *Project Description*. This chapter describes the physical environment at and within the vicinity of LAX that may be affected by the proposed project; the impacts to that physical environment; and the measures proposed to mitigate those impacts, as required.

The Notice of Preparation (NOP)/Initial Study for this EIR, which was published on December 7, 2017, identified the following environmental resource areas for further evaluation in the EIR, which are addressed in this chapter:

- Air Quality (including Human Health Risk)
- Cultural Resources (Historical Resources)
- Greenhouse Gas Emissions
- Transportation/Traffic

In addition, Appendix F of the State CEQA Guidelines requires an EIR to consider the potentially significant energy impacts of the proposed project. Therefore, Section 6.5 in Chapter 6, *Other Environmental Considerations*, addresses the infrastructure capacity and demand associated with the energy consumption associated with the construction and operation of the proposed project.

Organization

Each of the environmental resource areas addressed in this chapter is discussed in a separate section using a common organization. Sections are numbered 4.1, 4.2, 4.3, and 4.4. The sections are divided into subsections to simplify and clarify the discussion. Within each environmental resource area section, discussion of the following is provided:

- The **Introduction** briefly describes the resource topics addressed in the analysis. The Introduction also identifies any specific resource topic for that environmental resource area that is not being addressed as part of this EIR and provides a discussion explaining the reasons why. For air quality, cultural resources, and transportation/traffic, a number of individual resource topics were evaluated and it was determined that the proposed project would have no impact or impacts were determined to be less than significant, as documented in the Initial Study that was published with the NOP for the proposed project on December 7, 2017 (included as Appendix A of this EIR).³⁵
- The **Methodology** describes how the resource topics were approached, including explanations of any assumptions; identification of information sources used for the analysis; and delineation of the study area considered for each environmental resource area. This section also identifies the environmental baseline where that baseline differs from 2017. A discussion of the environmental baseline is provided below under Analytical Framework.
- The **Existing Conditions** discusses the baseline conditions for the environmental resource topic in the study area, including relevant activities, facilities, and regulations. The environmental baseline is described below under Analytical Framework.

³⁵ As an example of an individual resource topic that was determined to be less than significant, the Initial Study determined that the proposed project would not result in a change in air traffic patterns. Therefore, this individual resource topic is not addressed in the EIR, although other individual topics related to Transportation/Traffic are evaluated in the EIR.

4. Environmental Impact Analysis

- The **Thresholds of Significance** are quantitative or qualitative criteria used to determine whether a significant environmental impact would occur as a result of the project. This section identifies the origins of the thresholds of significance used in the analysis. In general, and unless otherwise noted, the thresholds of significance used in the analysis of the proposed project impacts reflect guidance provided in Appendix G of the State CEQA Guidelines and/or criteria or guidance included in the L.A. CEQA Thresholds Guide.^{36,37}
- The **Impacts Analysis** section presents the analysis of impacts for the construction (build-out horizon year 2020) of the proposed project. Impacts were compared to the thresholds of significance to determine whether they would be, under CEQA, significant or less than significant. For purposes of determining significance, impacts were compared to the environmental baseline conditions, as further described in the Analytical Framework below. The impact analysis includes a determination of the level of significance of impacts under each threshold before mitigation.
- **Cumulative Impacts** are the impacts of the proposed project in conjunction with other development projects at and immediately adjacent to LAX. The environmental impacts of the proposed project may be individually minor, but cumulatively considerable when considered in conjunction with other projects.
- **Mitigation Measures** are specified procedures, plans, policies, or activities proposed for adoption by the lead agency to reduce or avoid the significant impacts identified in the analysis of environmental impacts. This section identifies project-specific mitigation measures that have been proposed to address significant impacts that would occur with implementation of the proposed project. In accordance with the requirements of CEQA, a mitigation monitoring and reporting program (MMRP) would be adopted as part of the proposed project approvals, to ensure that implementation of mitigation measures is properly monitored and documented.
- **Level of Significance After Mitigation** is a CEQA determination of the significance of a particular impact after implementation of the proposed mitigation measures. This section identifies any significant impacts that cannot be mitigated to a level that is less than significant. These "significant unavoidable impacts" are also listed in Chapter 6, *Other Environmental Considerations*, of this EIR.

Effects Found Not to be Significant in Initial Study

In accordance with Sections 15063(c)(3)(A) and 15128 of the State CEQA Guidelines, further detailed analysis of specific environmental resource areas is not required in an EIR where it was determined in the Initial Study that the proposed project would have no impact or impacts were determined to be less than significant. Instead, the EIR need only contain a brief statement indicating the reasons that the various possible significant effects of a project were determined not to be significant, which, in this instance, is contained in the Initial Study (included as Appendix A of this EIR). The Initial Study determined there would be “no impact” or impacts would be “less than significant” for Aesthetics, Agriculture and Forestry Resources, Biological Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, and Utilities and Service Systems.

³⁶ State of California, *Guidelines for California Environmental Quality Act (State CEQA Guidelines)*, California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387.

³⁷ City of Los Angeles, *L.A. CEQA Thresholds Guide, Your Resource for Preparing CEQA Analyses in Los Angeles*, 2006.

For the reasons explained in the Initial Study, the Initial Study identified impacts to archaeological, paleontological, and tribal cultural resources as impacts that would be potentially significant unless mitigation was incorporated. The Initial Study further identified measures that would address these impacts. These measures reflect plans, policies, and procedures that have been adopted by LAWA and that apply to all construction projects at LAX. Therefore, these measures are not mitigation measures as defined by CEQA. Nevertheless, the plans, policies, and procedures would be implemented during construction as required. In consideration of the fact that these plans, policies, and procedures would be required to be implemented as part of the proposed project, this Draft EIR concludes that impacts to archaeological, paleontological, and tribal cultural resources would be less than significant and no mitigation is required.

Analytical Framework

Environmental Baseline

Section 15125 of the State CEQA Guidelines requires that an EIR describe the physical environmental conditions in the vicinity of a proposed project "as they exist at the time the notice of preparation is published..." and further states that "[t]his environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."

The Notice of Preparation (NOP) for this EIR was published on December 7, 2017. In accordance with the provisions of CEQA Guidelines Section 15125, 2017 is the baseline year for characterizing existing conditions in the environmental analysis. Where existing conditions data specific to 2017 were not available, this EIR identifies this fact, explains what data were used to determine existing conditions, and provides evidence of why this information is representative of baseline conditions.

Description of Cumulative Impacts

As defined in the State CEQA Guidelines Section 15355, cumulative impacts are the impacts of the proposed project in conjunction with past, present, and reasonably foreseeable probable future projects. The environmental impacts of the project may be individually minor, but cumulatively considerable when considered in conjunction with other projects.

In accordance with the State CEQA Guidelines Section 15130, the proposed project must be evaluated for cumulative impacts to determine if they would be significant. This EIR provides an analysis of cumulative impacts to environmental resources addressed in this EIR that would be associated with construction and operation of the proposed project in conjunction with other development projects at and immediately adjacent to LAX.

In accordance with State CEQA Guidelines Section 15130(b), there are essentially two approaches to evaluating cumulative impacts:

- a. List past, present, and reasonably foreseeable probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- b. Summarize projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program.

4. Environmental Impact Analysis

For purposes of analyzing the proposed project's cumulative impacts to air quality (including human health risk), cultural resources (historical resources), greenhouse gas emissions, and transportation/traffic, the first approach – the list approach – is used in this EIR.

Other development projects at and immediately adjacent to LAX that could, in conjunction with the proposed project, result in cumulative impacts to the environmental resources addressed in this EIR are described in Chapter 3, *Overview of Project Setting*, and are listed in Table 3-1 and identified in Figure 3-1; an analysis of cumulative impacts is included within the analysis of each of the four environmental resource areas evaluated in this chapter.