Appendix A – Notice of Preparation/Scoping

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Appendix A.1 Notice of Preparation/Initial Study

Notice of Preparation and Initial Study

Los Angeles International Airport

United Airlines East Aircraft Maintenance and Ground Support Equipment Project

Lead Agency:

Los Angeles World Airports

One World Way, Room 218
Los Angeles, California 90045

Prepared by:

CDM Smith

111 Academy Way, Suite 150
Irvine, California 92617

December 7, 2017

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California Environmental Quality Act

NOTICE OF PREPARATION
OF AN ENVIRONMENTAL IMPACT REPORT

DATE: December 7, 2017

TO: Office of Planning and Research –
State Clearinghouse,
Responsible or Trustee Agency, and
Interested Parties

FROM: City of Los Angeles
Los Angeles World Airports
One World Way, Room 218
Los Angeles, California 90045

PROJECT NAME: Los Angeles International Airport (LAX) United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project

PROJECT LOCATION/ADDRESS: The project will occur at LAX, which is situated within the western portion of the City of Los Angeles, an incorporated city within Los Angeles County (see **Figure 1**). The project is the redevelopment of UAL's East Maintenance Facility in order to consolidate duplicate aircraft and GSE maintenance, storage, and office functions from two existing locations. Under the proposed project, the existing West Maintenance Facility located south of World Way West between Taxiway AA and Taxiway R, would be vacated, and activities would be consolidated at the existing East Maintenance Facility (project site), located in the eastern portion of LAX, east of Sepulveda Boulevard and south of Century Boulevard (see **Figure 2**). The project site is located at 6000-6016 and 6020-6024 Avion Drive, Los Angeles, California.

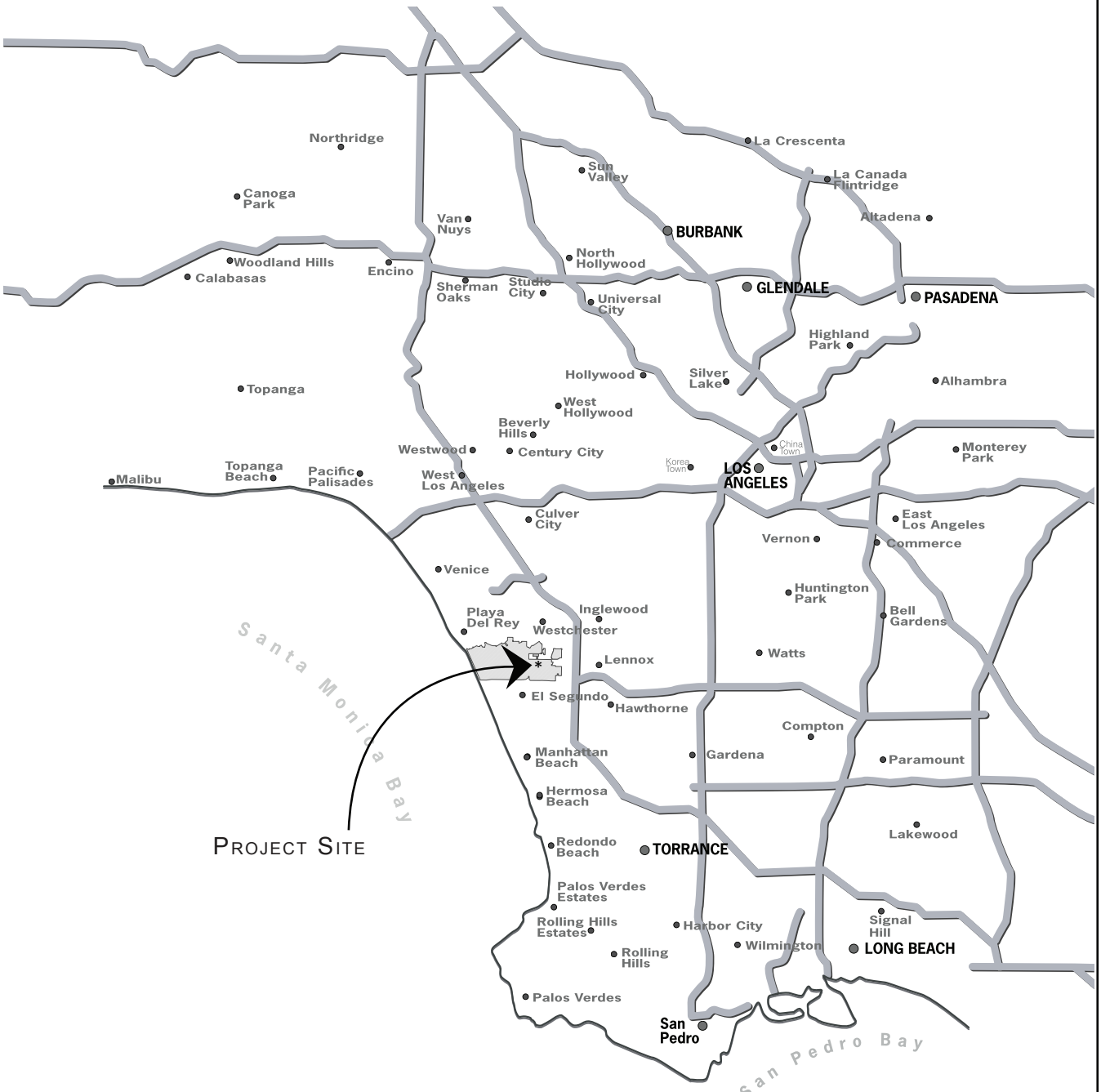
COMMUNITY PLANNING AREA: LAX Plan

COUNCIL DISTRICT: 11 – Bonin

DUE DATE FOR PUBLIC COMMENTS: January 8, 2018

The Los Angeles World Airports (LAWA), a propriety department of the City of Los Angeles (City), will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below (proposed project). LAWA, as the Lead Agency, must prepare and distribute a Notice of Preparation (NOP) after it decides to prepare an EIR. LAWA, through the NOP, solicits participation in determining the scope of the EIR from responsible public agencies (those which may have discretionary approval authority over the proposed project or an aspect of it), trustee agencies (agencies with jurisdiction over a natural resource held in public trust that the project may affect), and from local governments, regional agencies, private individuals, and organizations which may have concerns about the proposed project.

A scoping meeting will be held during the 30-day NOP review period to receive input as to what areas the EIR should study. No decisions about the proposed project will be made at the scoping meeting.



Source: CDM Smith, September 2017.
Prepared by: CDM Smith, September 2017.

LAX UAL East Aircraft Maintenance and GSE Project	Regional Location Map	Figure 1

Source: United Airlines, 2017.
Prepared by: CDM Smith, November 2017.

LAX UAL East Aircraft Maintenance and GSE Project	Project Site	Figure **2**

The project description, a list of agencies and City entities which may be required to take actions associated with the proposed project, and the environmental resources that may be affected by the proposed project are identified below. A copy of the Initial Study prepared for the proposed project is available during the 30-day NOP review period at LAWA's website at http://www.OurLAX.org and at the locations listed below:

- LAWA, One World Way, Room 218, Los Angeles, California 90045
- Westchester-Loyola Village Branch Library, 7114 West Manchester Avenue, Los Angeles, California 90045
- Inglewood Public Library, 101 West Manchester Blvd. Inglewood, California 90301
- El Segundo Public Library, 111 West Mariposa Ave, El Segundo, California 90245
- Playa Vista Branch Library, 6400 Playa Vista Drive, Los Angeles, California 90094

PROJECT DESCRIPTION: The proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX in light of an upcoming lease expiration for one of two existing UAL aircraft maintenance areas at LAX, which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Currently UAL performs maintenance in two areas at LAX: West Maintenance Facility (also known as the United Airlines Maintenance Facility, and formerly known as the Continental Airlines Aircraft Maintenance Hangar) and East Maintenance Facility (also known as the United Airlines Maintenance Operations Center or MOC). The West Maintenance Facility is located in the western portion of LAX, south of World Way West approximately 0.7 mile east of Pershing Drive, and the East Maintenance Facility is located south of Century Boulevard, approximately 0.45 mile east of Sepulveda Boulevard. UAL's lease of the West Maintenance Facility will expire in 2020. UAL proposes to vacate the western facility and redevelop their existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Once vacated by UAL, the West Maintenance Facility would remain vacant until such time as LAWA leases the facility to a tenant or proposes redevelopment of the site, which would be subject to its own environmental review and documentation, as appropriate.

The proposed project would redevelop an approximately 37-acre site in the eastern portion of the airport operations area (AOA). With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. The proposed project would not affect the Quonset Hut; the facility would remain in its current location. With project implementation, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. The consolidation would alter on- and off-airport vehicular movements, as well as aircraft movements on the airfield. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility, including Imperial Highway, Pershing Drive, and Westchester Parkway, would instead drive to the East Maintenance Facility, which would be accessed via Century Boulevard. Similarly, on the airfield, GSE and aircraft that currently travel on taxiways and taxilanes to access the West Maintenance Facility would instead travel to the East Maintenance Facility. The proposed project would not increase flights and/or aircraft

operations at LAX compared to existing airfield conditions and would not increase passenger or gate capacity.

NECESSARY APPROVALS: LAWA has principal responsibility for approving the proposed project. Agencies and City entities which may be required to take actions associated with the proposed project include, but may not be limited to, the following:

- U.S. Department of Transportation Federal Aviation Administration
- South Coast Air Quality Management District
- LAWA Board of Airport Commissioners
- City of Los Angeles City Council
- City of Los Angeles Department of Building and Safety
- City of Los Angeles Department of Public Works, Bureau of Sanitation
- City of Los Angeles Department of Planning, Office of Historic Resources
- Other Federal, State, or local approvals, permits, or actions as may be determined necessary.

ENVIRONMENTAL RESOURCES POTENTIALLY AFFECTED: Impacts related to air quality, cultural resources (historic resources), greenhouse gas emissions, and transportation/traffic, and their related cumulative impacts have been found to be potentially significant and will be analyzed in an EIR prepared for the proposed project. The EIR will also address energy implications of the proposed project, with emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy pursuant to CEQA Guidelines Appendix F. The Initial Study found that the proposed project would have no impact, or less than significant impacts, on all other environmental resources (i.e., aesthetics, agriculture and forestry resources, biological resources, cultural resources (archaeological and paleontological 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, tribal cultural resources, and utilities and service systems). No further analysis of these resource areas is planned for the EIR.

PUBLIC SCOPING MEETING DATE AND LOCATION: A public scoping meeting in an open house format will be held to receive public comment regarding the scope and content of the environmental information to be included in the Draft EIR. LAWA encourages all interested individuals and organizations to attend this meeting. The location, date, and time of the public scoping meeting for this project are as follows:

Date: December 19, 2017

Time: 6:00 pm to 8:00 pm
Arrive any time to speak one-on-one with City staff and project consultants.

Location: Flight Path Museum & Learning Center
6661 West Imperial Highway
Los Angeles, California 90045

NEXT STEPS: LAWA is requesting input during the NOP 30-day public review period from interested government and quasi-government agencies, other organizations, and private citizens regarding the scope and content of environmental information to be included in the EIR. In the future, public agencies receiving this notice may need to use the EIR prepared by LAWA when considering their permits or other approvals for the proposed project.

Any public agencies that respond to this Notice are requested, at a minimum, to:

1. Describe significant environmental issues, reasonable alternatives and mitigation measures which they would like to have addressed in the EIR.
2. State whether they are a responsible or trustee agency for the project, explain why and note the specific project elements that are subject to their regulatory authority.
3. Provide the name, address and phone number of the person who will serve as their point of contact throughout the environmental review process for this project.

LAWA welcomes all comments regarding potential environmental impacts of the project and the issues to be addressed in the EIR. All comments will be considered in the preparation of the EIR. **Written comments must be submitted to the contact and office noted below no later than 5:00 p.m. on January 8, 2018.** On receipt of comments on the NOP, LAWA will consider those comments and prepare the Draft EIR. The Draft EIR will analyze the significant adverse impacts from the proposed project, identify feasible potential mitigation measures, and analyze potentially feasible alternatives to the proposed project that could reduce or avoid identified significant impacts while still achieving most of the basic project objectives.

Please direct your comments to:

Maritza Lee
Los Angeles World Airports
One World Way, P.O. Box 92216
Los Angeles, California 90009-2216
(800) 919-3766

Comments can also be submitted on LAWA's website at http://www.OurLAX.org.

Signature: _____
Evelyn Quintanilla
Title: Chief of Airport Planning II
Date: December 4, 2017

LOS ANGELES INTERNATIONAL AIRPORT

UNITED AIRLINES EAST AIRCRAFT MAINTENANCE AND GSE PROJECT

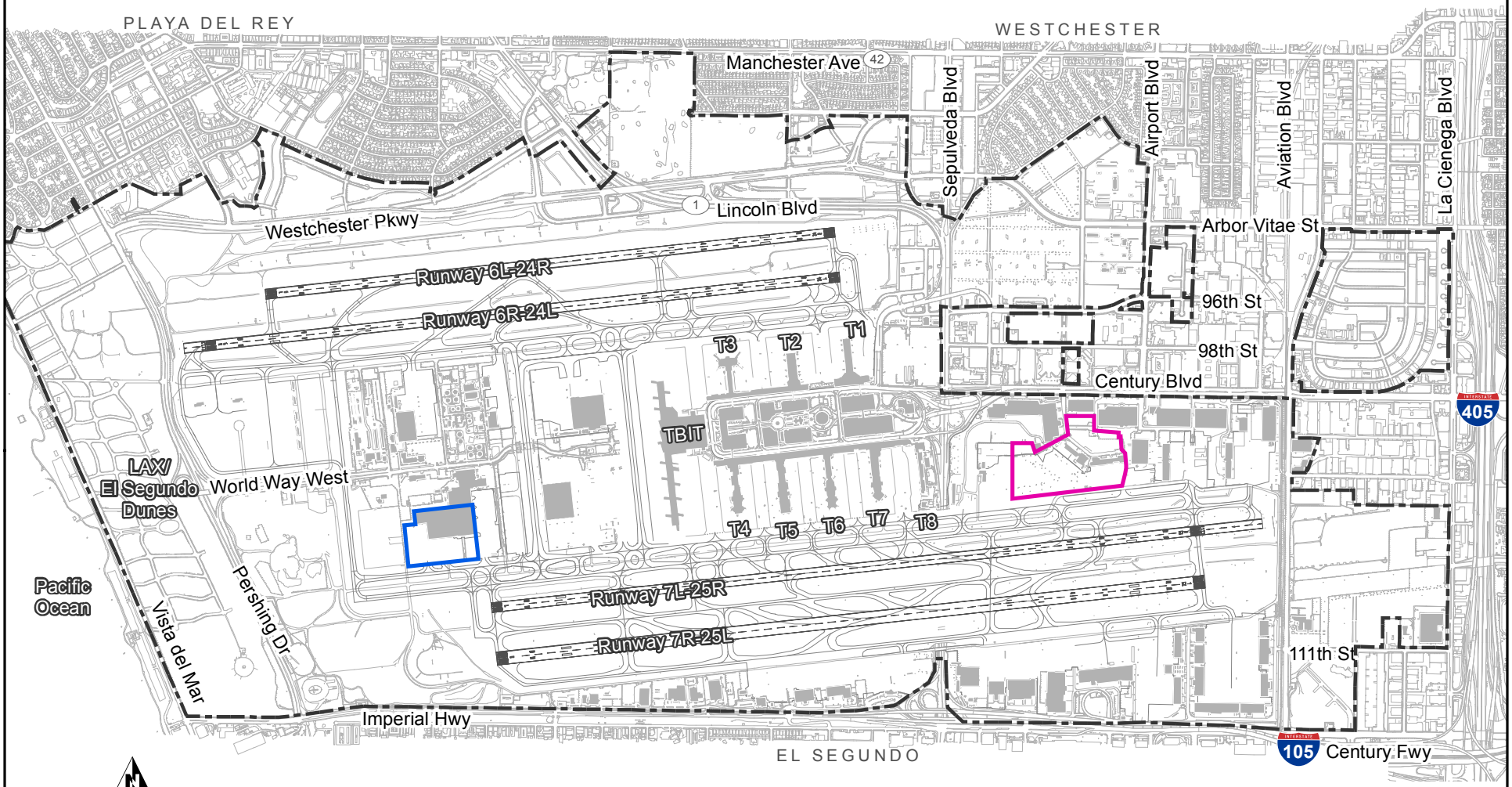
INITIAL STUDY

1. INTRODUCTION

Los Angeles World Airports (LAWA) is the lead agency for the Los Angeles International Airport (LAX) United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project (referred to hereafter as the proposed project). The intent of the proposed project is to consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX in light of an upcoming lease expiration for one of two existing UAL aircraft maintenance areas at LAX, which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Currently UAL performs maintenance in two areas at LAX: West Maintenance Facility (also known as the United Airlines Maintenance Facility, and formerly known as the Continental Airlines Aircraft Maintenance Hangar) and East Maintenance Facility (also known as the United Airlines Maintenance Operations Center or MOC). The location of these facilities is shown in **Figure 3.** As shown in the figure, the West Maintenance Facility is located in the western portion of LAX, south of World Way West approximately 0.7 mile east of Pershing Drive, and the East Maintenance Facility is located south of Century Boulevard, approximately 0.45 mile east of Sepulveda Boulevard. The distance between the two facilities is approximately 1.6 miles. Both facilities have aircraft service areas, which include enclosed hangars in the West Maintenance Facility, aircraft parking spots, GSE shops, maintenance and inspection rooms and functions, and office and storage space.

UAL's lease of the West Maintenance Facility will expire in 2020. UAL proposes to vacate the western facility and redevelop their existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Once vacated by UAL, the West Maintenance Facility would remain vacant until such time as LAWA leases the facility to a tenant or proposes redevelopment of the site, which would be subject to its own environmental review and documentation, as appropriate.

The proposed project would redevelop an approximately 37-acre site in the eastern portion of the airport operations area (AOA). With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. The proposed project would not affect the Quonset Hut; the facility would remain in its current location.



Source: CDM Smith, November 2017.
Prepared by: CDM Smith, November 2017.

LAX UAL East Aircraft Maintenance and GSE Project	Existing UAL Maintenance Facilities at LAX	Figure **3**

Although the portion of UAL's current aircraft and GSE maintenance operations that occurs at the West Maintenance Facility would be consolidated with operations located on the east side of the airport, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. The consolidation would alter on- and off-airport vehicular movements, as well as aircraft movements on the airfield. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility, including Imperial Highway, Pershing Drive, and Westchester Parkway, would instead drive to the East Maintenance Facility, which would be accessed via Century Boulevard. Similarly, on the airfield, GSE and aircraft that currently travel on taxiways and taxilanes to access the West Maintenance Facility would instead travel to the East Maintenance Facility. The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not increase passenger or gate capacity.

2. PROJECT LOCATION AND SURROUNDING LAND USES

2.1 Regional Setting

As shown in Figure 1, the project site is located within the City of Los Angeles, at LAX on LAWA property. The project site is located within the LAX Plan area of the City of Los Angeles, which is in the County of Los Angeles. LAX is the primary airport for the greater Los Angeles area, encompassing approximately 3,800 acres, and is situated at the western edge of the City of Los Angeles.

In the LAX vicinity, the community of Westchester is located to the north, the City of El Segundo is to the south, the City of Inglewood and unincorporated portions of Los Angeles County are to the east, and the Pacific Ocean lies to the west. Regional access to LAX is provided by Interstate 105 (I-105), which runs east-west and is located adjacent to LAX on the south, and the San Diego Freeway (Interstate 405 or I-405), which runs north-south and is located east of LAX. Access to the west side of the airport is via Imperial Highway and Pershing Drive.

2.2 Local Setting and Land Uses

The 37-acre project site is located within the eastern portion of LAX, parallel to and south of Century Boulevard (see Figure 2). The project site includes UAL's existing 32-acre maintenance leasehold, which consists of paved areas currently used for UAL aircraft and GSE maintenance, with two large maintenance bays (designated Hangar 1 and Hangar 2), apron areas, maintenance areas, storage, office space, and surface parking (Parking Lot H). UAL's cargo building is adjacent to the project site to the northeast. As described in Section 4.4, a portion of the cargo leasehold would be used for the proposed maintenance facility. The project site also includes a 3-acre parcel to the north of UAL's existing facility, which is currently used as an airport shared-ride vehicle holding lot.

The land use setting around the project site is characterized by airport operations, aircraft maintenance facilities, and cargo facilities. Existing adjacent uses include the LAWA Records Building and American Eagle commuter facility to the west; air cargo facilities and Delta Air Lines aircraft maintenance facility to the northwest; a shared-ride vehicle holding lot and an employee parking structure (referred to as Parking Structure F) to the north; the UAL Cargo building to the northeast; American Airlines GSE facility to the east; and the LAX south airfield to the south, specifically Taxiway C, followed by Taxiway B, Runway 7L-25R, Taxiway H (centerline taxiway), Runway 7R-25L, and Taxiway A. Surrounding land uses are identified in **Figure 4**.

The Los Angeles International Airport Plan (LAX Plan), the City of Los Angeles General Plan Land Use Element that governs uses on LAX, designates the project site as Airport Airside.[1] The corresponding LAX Specific Plan designates this area as LAX Zone: Airport Airside Subarea.[2]

3. EXISTING FACILITIES

UAL's lease at the West Maintenance Facility will expire in 2020, at which time UAL will vacate the western facility. The proposed project would redevelop UAL's East Maintenance Facility to respond to the need to vacate the West Maintenance Facility by 2020. The project would consolidate duplicate aircraft and GSE maintenance, storage, and office functions from two existing locations into a single location. Following is a description of the existing facilities under lease to UAL at the two locations.

3.1 West Maintenance Facility

The West Maintenance Facility is situated on approximately 60 acres in the western airfield (see Figure 3). The facility consists of a four- to five-bay hangar; GSE storage and maintenance area, including 9 service bays, 1 paint bay and 1 wash bay; apron area (with a total of 15 aircraft parking positions and 6 blast fences[3]); and maintenance support stores and equipment. The total building area associated with the West Maintenance Facility is approximately 593,046 square feet. The current building area contains more building space than currently needed by UAL. Aircraft maintenance activities conducted at the West Maintenance Facility include routine scheduled maintenance checks (referred to as A-checks), and other maintenance activities. Employee parking for the West Maintenance Facility is provided in a secured lot in the vicinity of the hangar, with access provided via World Way West. The apron area located to the south and west of the hangar is bordered by blast fences. Other surrounding land uses include the LAX south airfield to the south; American Airlines operations facilities to the north and east; a building formerly occupied by Chelsea Food Services kitchen to the northeast; and the former Continental Airlines (CAL) General Office (GO) and Training buildings, which are vacant, farther north.

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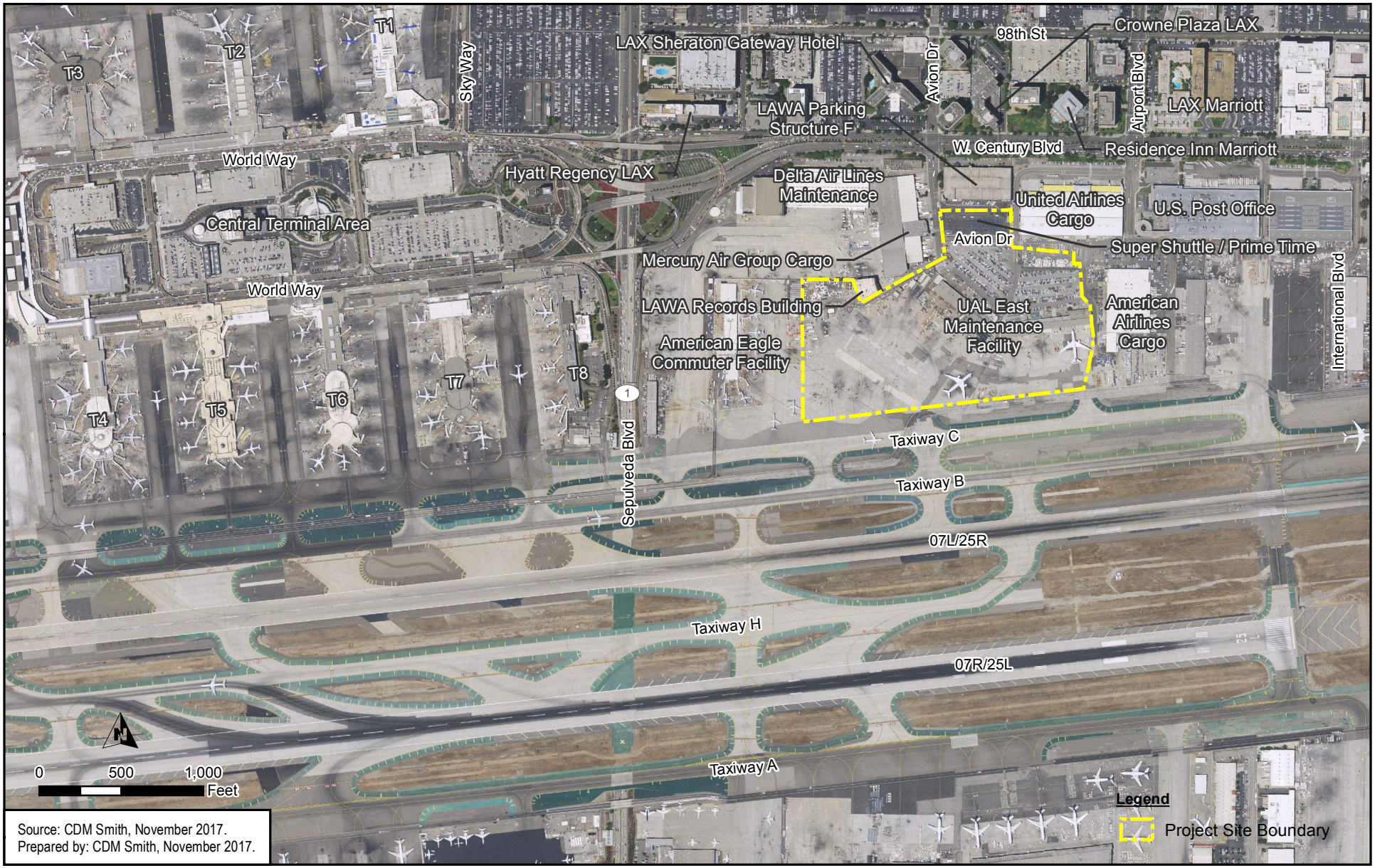
1 City of Los Angeles, Department of City Planning, *LAX Plan*, adopted December 14, 2004, last amended June 7, 2017.

2 City of Los Angeles, Department of City Planning, *Los Angeles International Airport (LAX) Specific Plan*, adopted December 14, 2004, last amended September 8, 2017. Available: http://www.lawa.org/uploadedFiles/OurLAX/pdf/17-0276-s2_ORD_185164_10-28-17.pdf.

3 A jet blast deflector, or blast fence, is a safety barrier that is used to substantially reduce or eliminate the damaging effects of jet blast or propeller wash from run-up areas (U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular AC 150/5300-13A, *Airport Design*, September 28, 2012, updated February 26, 2014).



Source: CDM Smith, November 2017.
Prepared by: CDM Smith, November 2017.

LAX UAL East Aircraft Maintenance and GSE Project	Project Vicinity and Surrounding Land Uses	Figure **4**

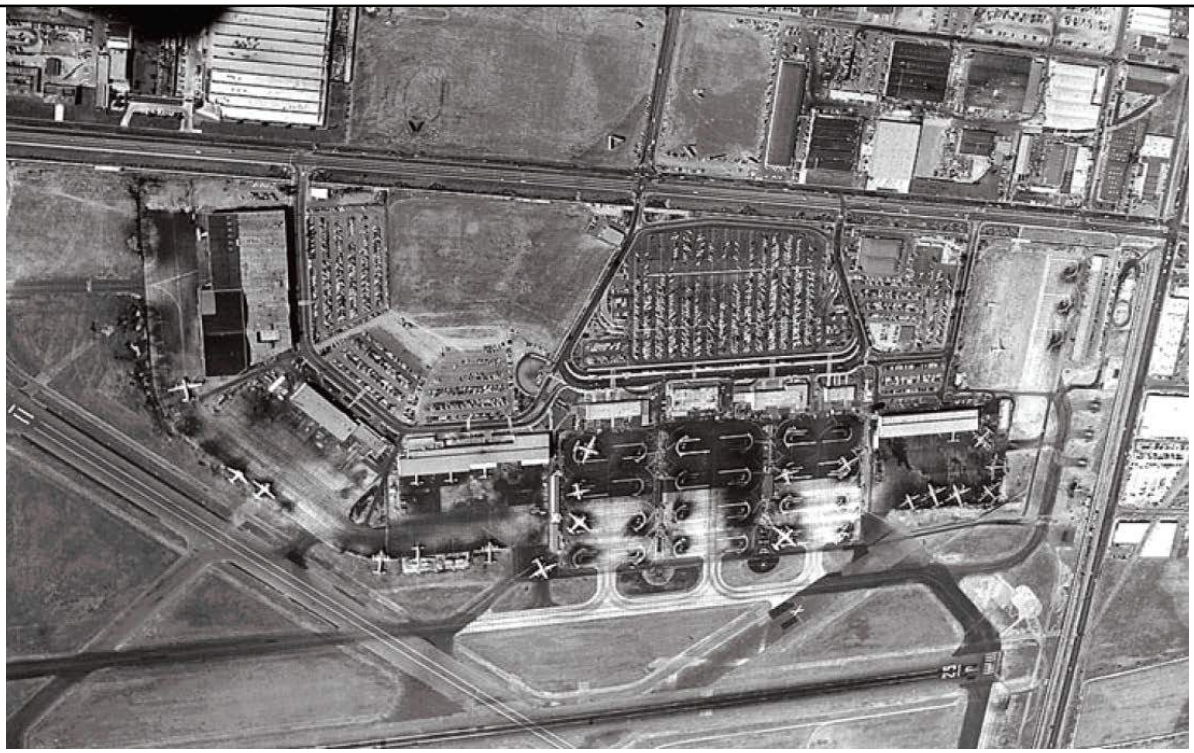
3.2 East Maintenance Facility

The East Maintenance Facility consists of two large structures designated "Hangar 1" and "Hangar 2" (although neither is an enclosed hangar capable of holding an aircraft, as further described below), an apron area providing 19 individual aircraft parking positions, maintenance areas, stores, and office space, on approximately 32 acres in the eastern airfield. Hangar 2 was constructed in 1944 and Hangar 1 was constructed in 1946. Hangar 1 is a two-story building that is used for GSE storage and maintenance, including support functions on the ground level, and offices on the second floor. Hangar 1 includes 10 GSE service bays and 2 paint bays. Hangar 2 is a tall, wide, open-faced structure that contains equipment and facilities used for various aircraft maintenance functions performed on aircraft parked outside on the adjacent apron. Such aircraft maintenance functions can be in the form of routine repair, inspection, or modification of an aircraft or aircraft components; cabin checks; and engine wash. Hangar 2 also contains offices and support rooms that serve employees (locker facilities and break room/shower facility), as well as a training facility. The total building area of the East Maintenance Facility is approximately 135,750 square feet. Also in the vicinity of Hangar 2 are Remain Over Night (RON) and Remain All Day (RAD) hold areas for aircraft. Employee parking associated with the East Maintenance Facility is located north of the project site (immediately north of Hangars 1 and 2), in Lot H, which is accessed from Avion Drive via Century Boulevard.

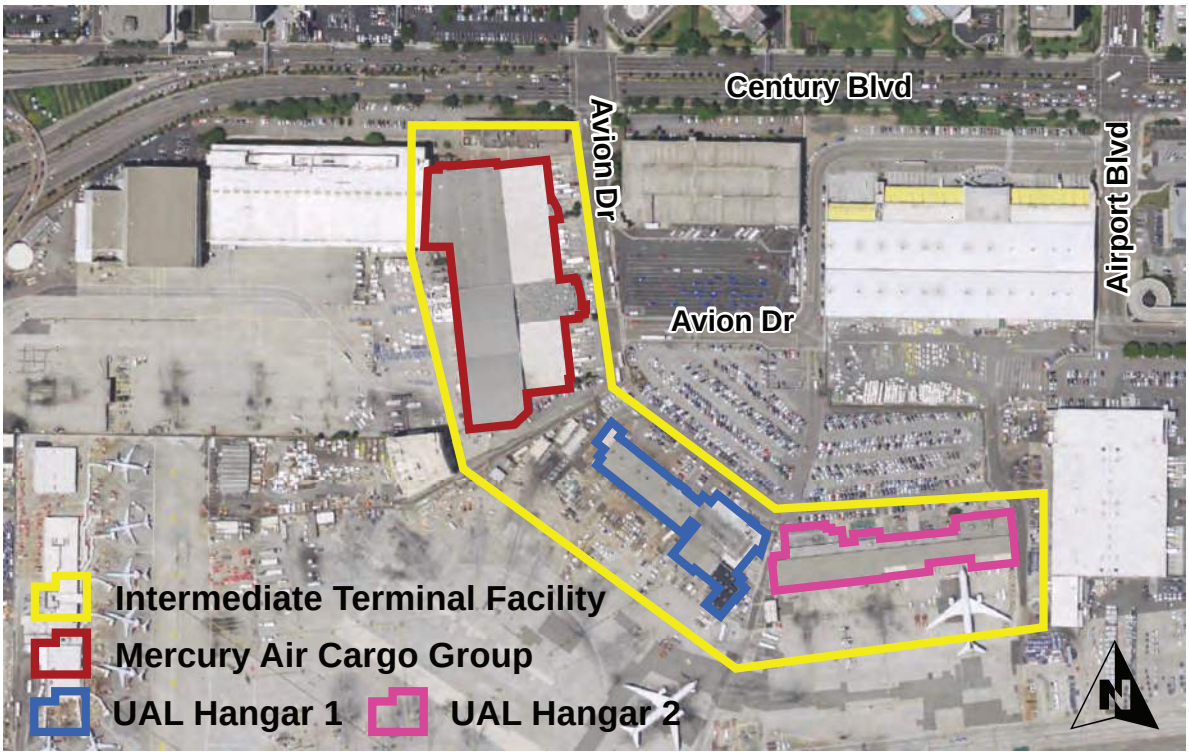
Hangars 1 and 2 comprise two of the three remaining buildings associated with the Intermediate Terminal Facility, which is located east of the existing LAX Central Terminal Area (CTA) on the western and southern sides of Avion Drive. (The third building, which is located to the northwest of Hangars 1 and 2, is currently occupied by Mercury Air Group Cargo.) The buildings that comprise the Intermediate Terminal Facility are shown in **Figure 5**. The Intermediate Terminal Facility was constructed between 1945 and 1947 to temporarily house airport administration and airline offices, passenger terminals, hangars, and aircraft service facilities.[4] Due to past demolition of the majority of the buildings, and alterations to the remaining buildings, the surviving grouping of three buildings does not retain sufficient integrity for listing in the National Register of Historic Places (National Register). However, the grouping of the two intact buildings referred to by UAL as Hangars 1 and 2 retain sufficient integrity to be eligible for listing in the California Register of Historical Resources (California Register) and as a City of Los Angeles Historic-Cultural Monument.[5]

[4] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, *(SCH 2015021014)*, Appendix J, LAX Preservation Plan, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20Jv2.pdf.

[5] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, *(SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20H.pdf.



Aerial View of LAX Intermediate Terminal Facility (1947)



LAX Intermediate Terminal Facility Remaining Buildings (2017)

Source: City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Appendix S-G: Supplemental Section 106 Report, April 2004.
Prepared by: CDM Smith, November 2017.

LAX UAL East Aircraft Maintenance and GSE Project	LAX Intermediate Terminal Facility	Figure **5**

The East Maintenance Facility also includes several smaller buildings. One of these is a Quonset Hut, which is located northwest of Hangar 1. The Quonset Hut is a semi-cylindrical structure constructed of corrugated steel sheeting placed atop arched metal rib framing. This type of structure was widely-used by the military during World War II; due to their portability and versatility, many World War II-era Quonset huts were adapted for a wide variety of everyday peacetime uses after the war. The Quonset Hut at the project site is believed to have been placed there by 1950. It is eligible for listing in the National Register and California Register, and as a City of Los Angeles Historic-Cultural Monument.[6]

4. PROJECT DESCRIPTION

4.1 Project Components

The intent of the proposed project is to consolidate and modernize existing UAL aircraft maintenance facilities at LAX, in light of an upcoming lease expiration for UAL's West Maintenance Facility at LAX. Most of the buildings that comprise the existing East Maintenance Facility were constructed in the mid to late 1940s and the building systems have not been significantly upgraded, are inefficient, and are at or beyond their useful lives. In addition, the size of the existing hangars and layout of the apron area do not match current aircraft fleet requirements.

While the basic elements of redeveloping and improving the East Maintenance Facility have been determined, the exact sizes and configuration of those elements are still being evaluated by the project applicant. The main elements of the proposed project are:

- Demolish the existing buildings associated with the East Maintenance Facility, with the exception of the Quonset Hut, which would not be affected by the proposed project.
- Construct and operate a new aircraft and GSE maintenance facility, totaling approximately 411,000 square feet, and consisting of the following elements:
    - Two wide body aircraft hangar bays with approximately 160,000 square feet of floor area and a height of approximately 110 feet, able to serve both narrow-body and wide-body aircraft
    - Aircraft maintenance shops with approximately 74,000 square feet of floor area
    - Aircraft parts/supplies stores with approximately 60,000 to 75,000 square feet of floor area, and an associated storage yard
    - Permanent GSE maintenance facility with approximately 45,000 to 50,500 square feet of floor area, 15 GSE bays, 2 paint bays, 1 wash bay, 40 electric GSE (eGSE) charging stations, and an associated storage yard

[6] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20H.pdf.

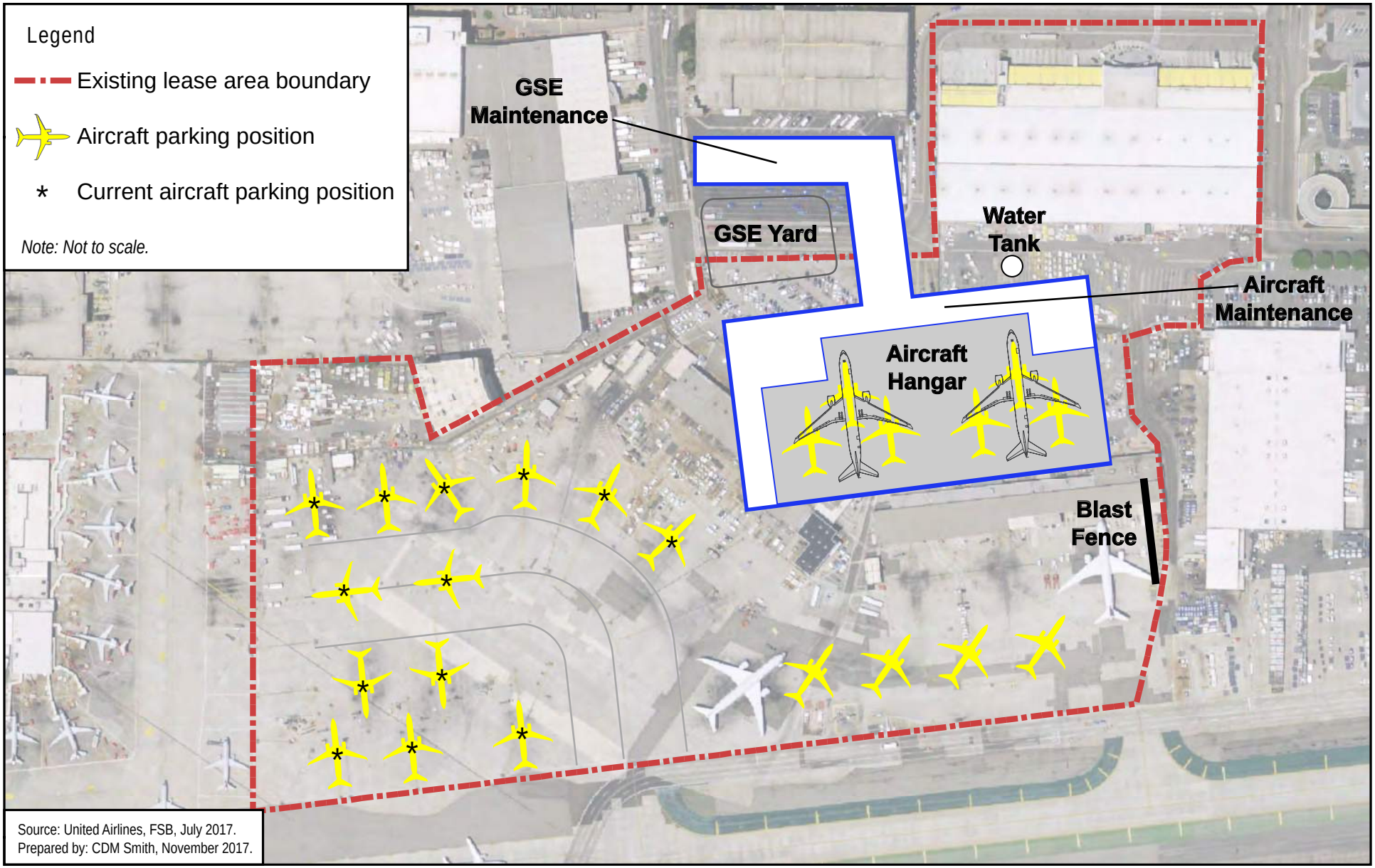
- Facility maintenance area with approximately 2,000 square feet of floor area
- Approximately 10,000 square feet of dock and skywalk support areas
- Approximately 40,000 to 60,000 square feet of building circulation and support
- Approximately 500,000-gallon water tank for fire suppression

- Relocate provisioning (i.e., storage) to a portion of the UAL Cargo building.
- Replace/resurface a portion of the apron area and restripe aircraft parking positions. A 15-foot buffer area would be established around the Quonset Hut to ensure its protection during construction. The portion of the apron located within this 15-foot setback would not be demolished or resurfaced, and no construction equipment would be permitted to operate within the setback.
- Reconfigure the apron and include aircraft parking positions in the hangar for a total of 23 aircraft parking positions on the leasehold, including 6 in the hangar, 4 on the south side of the project site, and 13 within the western portion of the leasehold.
- Construct a jet blast deflector, also referred to as a blast fence, on the eastern portion of the project site for the purpose of conducting aircraft engine run ups. With this blast fence, the proposed project would accommodate aircraft engine run up activities that would be conducted at the East Aircraft Maintenance Facility approximately 90 percent of the time; the remaining run ups would occur at other facilities within the airfield).[7]
- Relocate and/or remove utilities, including water and wastewater pipelines, storm drain facilities, clarifiers, fuel lines, and an onsite triturator.[8]
- Install a backup generator to provide emergency power.
- Vacate the east-west portion of Avion Drive that abuts Parking Lot H to the north.
- Relocate employee parking from Parking Lot H to Parking Structure F, which is located north of the existing East Maintenance Facility, on the south side of Century Boulevard.

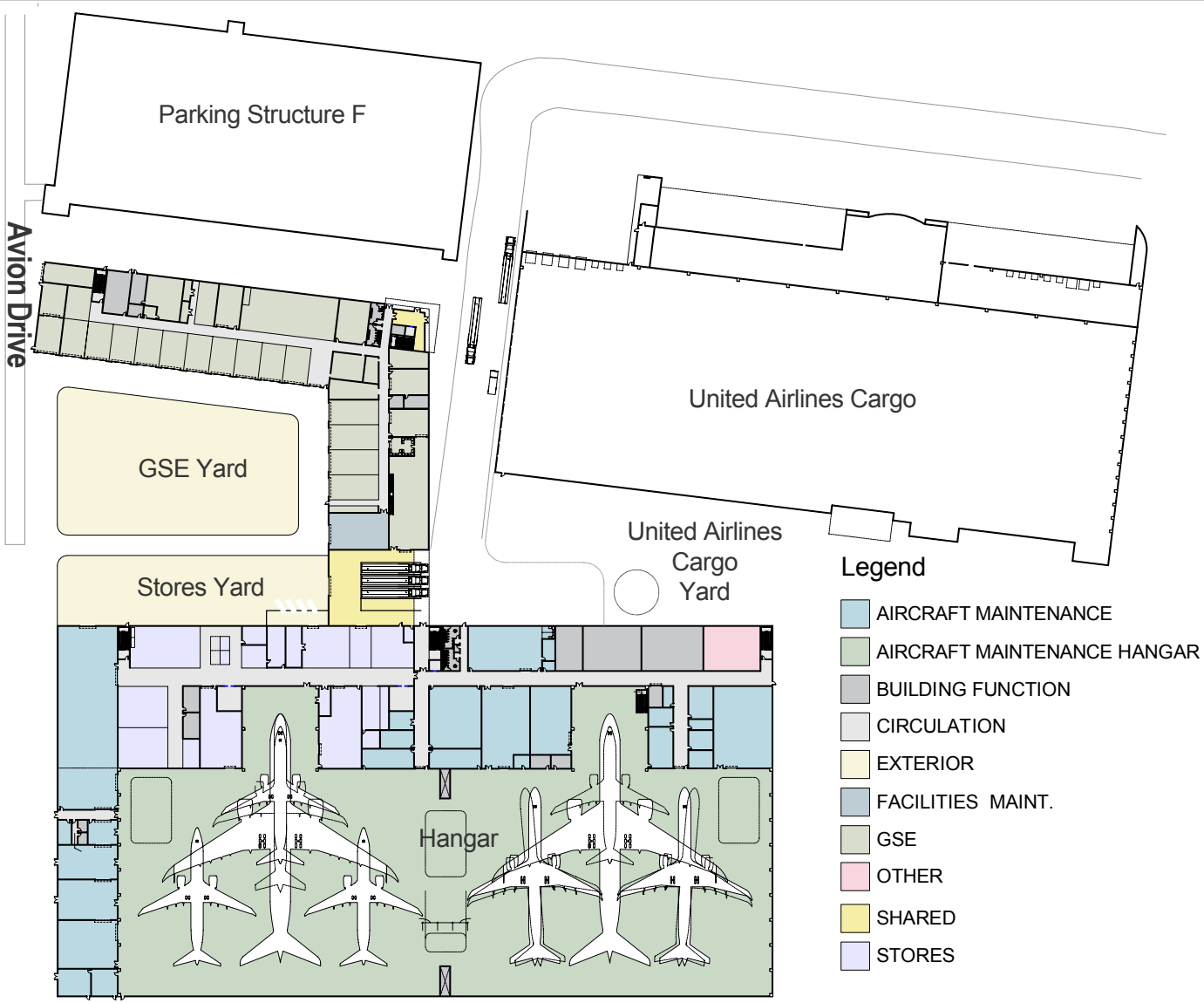
Table 1 identifies existing and proposed building sizes and aircraft parking positions. **Figure 6** illustrates a conceptual site plan for the proposed project. Conceptual floor plans are provided in **Figure 7** and **Figure 8**.

[7] Aircraft engine ground run-ups normally require that the aircraft be positioned facing into the wind. At LAX, the predominant wind direction is from west to east, and the proposed blast fence would be positioned to accommodate aircraft engine run-ups in these wind conditions. When UAL aircraft engine ground run-ups are required during conditions where the wind direction is not from west to east, the run-ups would occur at another location at LAX where there is a blast fence available for the non-standard wind conditions.

[8] A triturator is a below-grade automated facility that accepts aircraft lavatory sewage (transported from the aircraft via lavatory vehicles) and conveys the material to the sanitary sewer system.



LAX UAL East Aircraft Maintenance and GSE Project	Conceptual Site Plan	Figure **6**

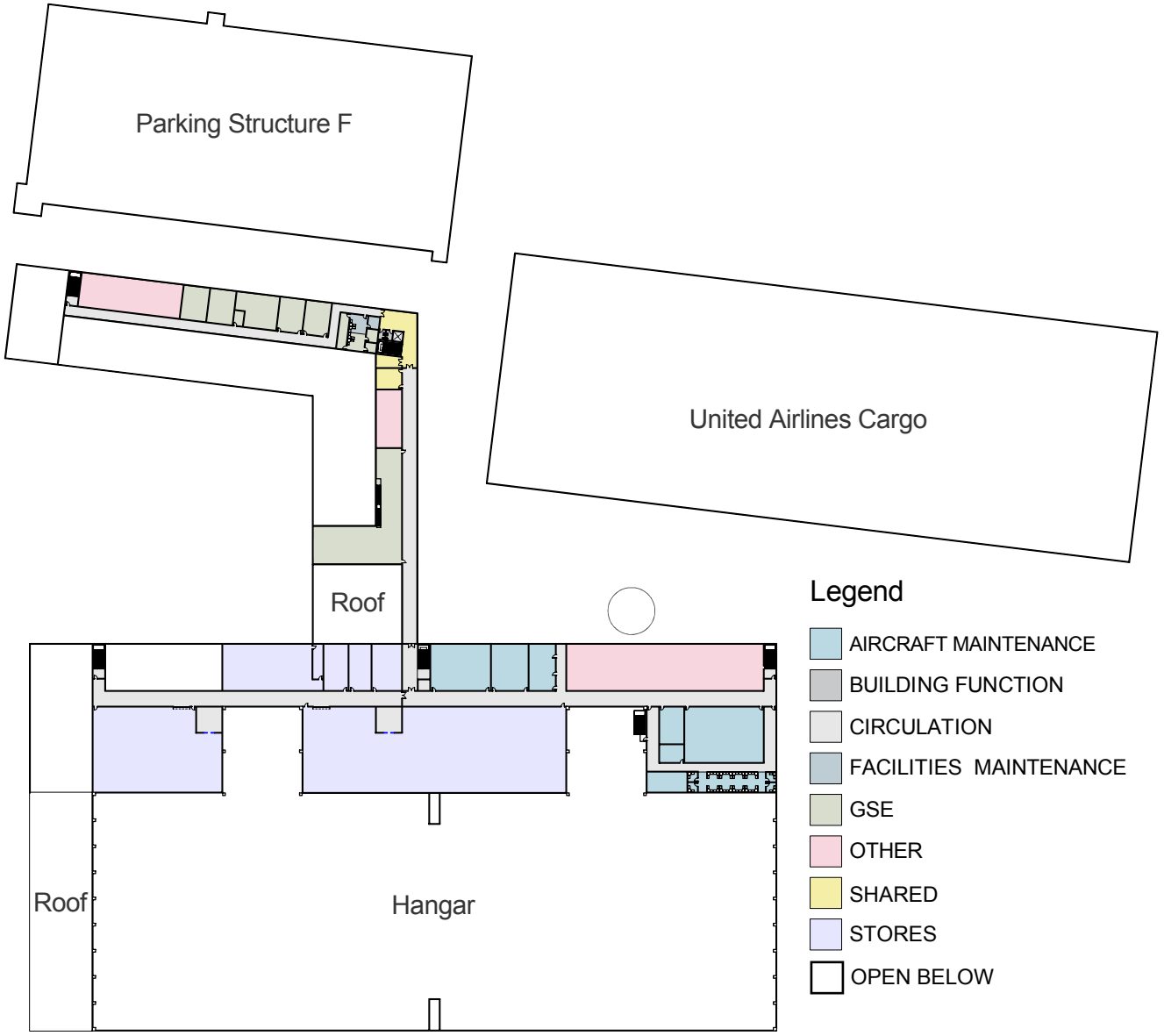


Source: United Airlines, FSB, July 2017.
Prepared by: CDM Smith, November 2017.

LAX UAL East Aircraft Maintenance and GSE Project

Proposed Floor Plan - Level 1

Figure
7



Source: United Airlines, FSB, July 2017.
Prepared by: CDM Smith, November 2017.

LAX UAL East Aircraft Maintenance and GSE Project	Proposed Floor Plan - Level 2	Figure **8**

Table 1 Existing and Proposed Facilities

Facility	Existing Facilities		Proposed Facilities	
	Approximate Building Area (square feet)	Aircraft Parking Positions	Approximate Building Area (square feet)	Aircraft Parking Positions
West Maintenance Facility	593,046	15	NA	NA
East Maintenance Facility	135,750	19	411,000	23
Total	**728,796**	**34**	**411,000**	**23**
Source: United Airlines, FSB, 2017.				

With project implementation, the square footage of the maintenance buildings would be substantially lower than the total square footage of the current east and west maintenance facilities. In addition, UAL would have fewer aircraft parking positions at LAX. Despite these changes, current maintenance activities would not be substantially reduced with project implementation. Rather, building space and ramp areas would be used more efficiently and some maintenance would be performed at the gate. The excess building area in the existing West Maintenance Facility leasehold would be eliminated.

As with the existing facilities, the proposed project would include eGSE charging stations within the GSE maintenance facility. The number of eGSE charging stations would be the same as the current number of stations (40). In addition, the hangar and aircraft apron would be designed as a "Pad-of-the-Future," with 400 Hz electric power for all aircraft parking positions, either through stationary or portable ground power units (GPUs), stationary or portable pre-conditioned air (PCA) units, and electrification of GSE maintenance activities. The portable GPUs and PCA units would include diesel, gasoline, and electric-powered units.

Some of the provisioning for the proposed facility may be located in a small area of the current UAL cargo building, and a portion of the current UAL cargo yard would be incorporated into the project site. Specifically, approximately 15,000 square feet of the 153,000-square-foot cargo building would be used for provisioning, and approximately 35,000 square feet of the 115,000-square-foot cargo yard area would be used for the proposed maintenance facility. Use of a portion of the cargo building and yard would not adversely affect cargo operations. As noted above, the project site would also incorporate an approximately 3-acre site that is currently used as a commercial shared-ride vehicle holding lot. LAWA is planning to relocate the shared-ride vans that currently use the holding lot to a parking area located on the north side of W. 111th Street (Parking Lot E), immediately east of the Proud Bird Food Bazaar and Events Center. This relocation is planned for Spring 2018 as part of ongoing operational changes at LAX. This relocation will occur independently of the proposed project.

4.2 Construction

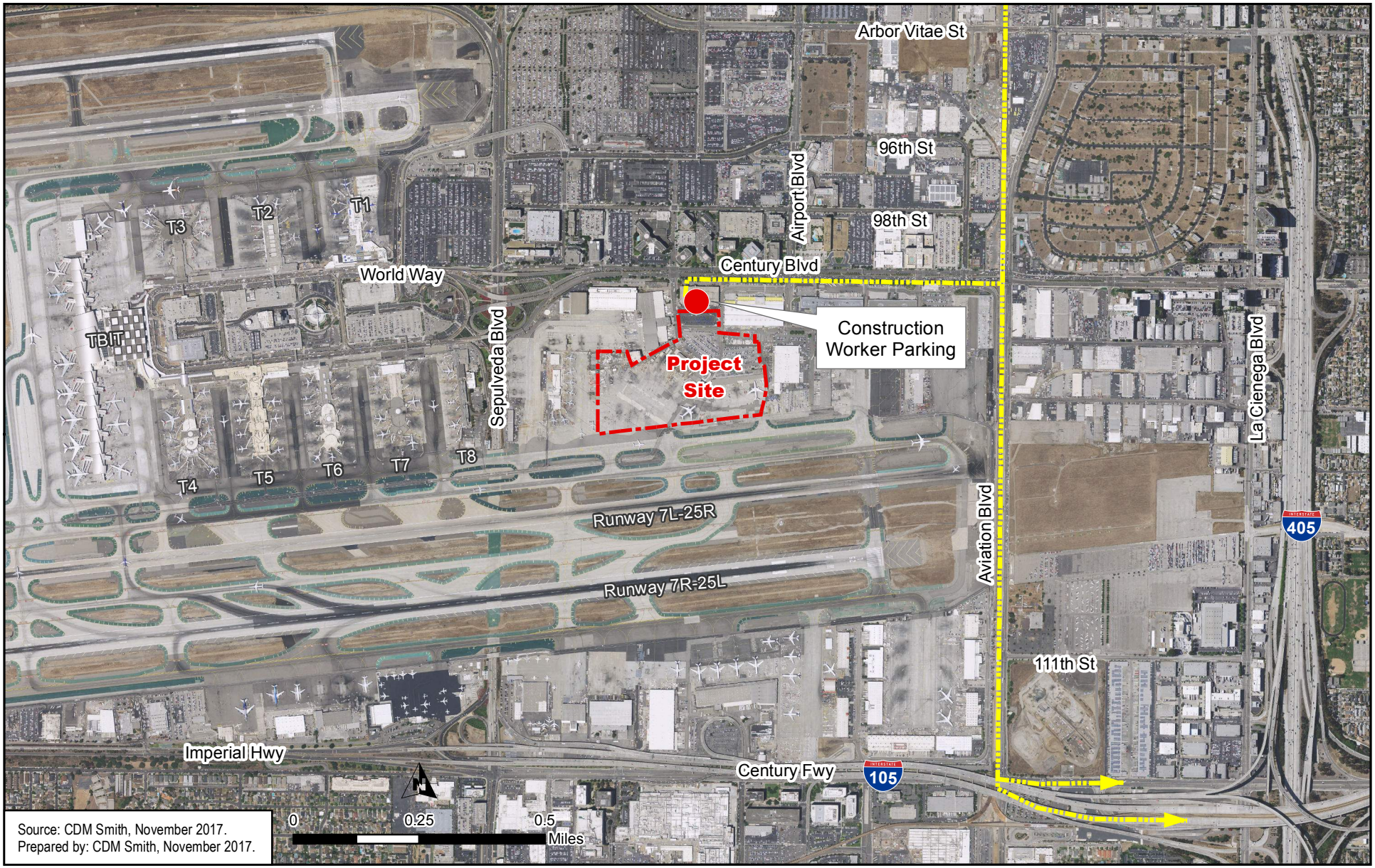
Construction of the proposed project would be phased over approximately 22 months (one year and ten months), beginning with the demolition of existing facilities in the East Maintenance Facility lease area. Prior to demolition, some of the existing functions that currently occur at the East Maintenance Facility, including administration and GSE maintenance, would be relocated to the West Maintenance Facility on an interim basis during construction. Aircraft maintenance would continue to be conducted on the eastside ramp area during construction. Temporary trailers would be placed on the project site to accommodate this activity.

Employees of the East Maintenance Facility who currently park at Parking Lot H would park in Parking Garage F during and after construction. East facility employees who would be relocated to the West Maintenance Facility during construction would continue to park on the east side of the airport during construction (in Parking Garage F) and would be bused on the airfield side (i.e., on non-public roadways) to and from the West Maintenance Facility.

Prior to the initiation of demolition activities, abatement of hazardous building materials within the East Maintenance Facility would be conducted to remove any asbestos-containing materials (ACM), lead-containing surfaces (LCS), and other hazardous materials that may remain inside the buildings. Abatement and disposal of hazardous building materials would be done in accordance with local, state, and federal regulations which govern the removal and disposal of hazardous building materials.

Demolition is projected to commence in the fourth quarter of 2018 and new construction would extend to August 2020. All construction staging would occur onsite. Construction worker parking is anticipated to be provided at Parking Structure F, which is located north of the current East Maintenance Facility on the south side of Century Boulevard. Construction shifts would be scheduled to avoid peak periods (7:00 to 9:00 a.m. and 4:30 to 6:30 p.m.). It is estimated that the peak number of construction employees onsite at any one time would be approximately 165 employees.

Trucks leaving the project site would travel north on Avion Drive, east on Century Boulevard, and either north on Aviation Boulevard to Manchester Boulevard, or south on Aviation Boulevard, connecting to Interstate 105 (I-105), La Cienega Boulevard, or Interstate 405 (I-405). The haul route for the proposed project is shown on **Figure 9**. All demolition and construction activities would occur on the landside and no entry to the Airport Operations Area (AOA) would be required. No lane or road closures of public roadways would be required for construction.



LAX UAL East Aircraft Maintenance and GSE Project	Proposed Construction Haul Route	Figure **9**

Construction activities and staging for the proposed project would be coordinated with LAWA's Construction and Logistics Management (CALM) Team. The CALM Team helps monitor and coordinate the construction logistics of development projects at LAX in the interest of avoiding conflicts between ongoing airport operations and construction activities. In accordance with standard LAWA practice, construction would be coordinated with the LAWA CALM Team to ensure that occupancy and operation of adjacent and surrounding facilities would be maintained throughout demolition and construction activities.[9]

As required by the Los Angeles Department of Building and Safety, LAWA would submit a Haul Route Form and Haul Route Map, as shown on Figure 9, identifying routes to be used by trucks to export soil or demolition debris offsite. In addition, in accordance with LAWA procedures, a Site Logistics Plan that identifies construction access and ingress/egress, staging/laydown, etc. would be submitted to the CALM Team.[10]

4.3 LAWA Design and Construction Practices

The proposed project would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy, which requires that the new building be designed to achieve the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) Silver certification, at a minimum.[11] LEED Silver certification requires a project to be designed in a manner to save energy, water, and other resources, and to generate less waste and support human health. In addition, the proposed project would be required to be constructed in accordance with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code (CALGreen).[12,13] The types of features that would be incorporated into project design and construction to meet LAWA's sustainability requirements include, but are not limited to, the types described below.

Non-hazardous construction and demolition debris generated at the site would be recycled or salvaged to the extent required to meet LEED Silver certification. The proposed improvements would include efficient lighting fixtures and controls with occupancy sensors where appropriate to reduce energy consumption during off-peak hours, and the heating, ventilation, and air conditioning controls within occupied areas would be designed to reset temperatures to maximum efficiency without sacrificing occupant comfort. Natural lighting would be provided in the hangar bays through the use of transparent or translucent panels in the sidewalls. Where possible, the facility would incorporate coated glass that minimizes heat gain as well as building materials and furnishings made of recycled content. During construction, low-emitting paints,

[9] City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Construction, Closeout & Safety – Coordination and Logistics Management (CALM)*, July 2016. Available: http://www.lawa.org/laxdev/DCHandbook_2017.aspx?id=Con.

[10] City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: LAWA Standards for the Construction Contract*, July 2016. Available: http://www.lawa.org/uploadedFiles/LAXDev/DCH/Construction/LAWA%20Standards%20for%20the%20Construction%20Contract%20-%20Closeout%20Requirements%20July%202016.pdf.

[11] City of Los Angeles, Los Angeles World Airports, *LAWA Sustainable Design and Construction Policy*, September 7, 2017.

[12] City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended.

[13] 24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*.

adhesives, carpets, and sealants would be used to the extent feasible. To conserve potable water, the restrooms in the new facility would be designed with low- or ultra-low-flow systems, and recycled water would be used for construction-related dust control and construction equipment washing when feasible. The relationship of these features and practices to potential project impacts is identified in Attachment A of the Initial Study.

In addition to the measures identified above, LAWA has implemented a wide range of actions designed to reduce temporary, construction-related air pollutant and greenhouse gas emissions from its ongoing construction program and has established aggressive construction emissions reduction measures, particularly with regard to requiring construction equipment and heavy duty trucks to be newer models that have low-emission engines or be equipped with emissions control devices.[14] To achieve this commitment, LAWA has developed standard control measures which would be applied to the proposed project. For example, on-road haul trucks with a gross vehicle weight rating of at least 14,001 pounds would comply with U.S. Environmental Protection Agency (USEPA) 2010 on-road emissions standards for particulate matter up to 10 micrometers in size (PM_{10}) and nitrogen oxides (NOx). Contractors would be required to use compatible on-road haul trucks or the next cleanest burning vehicle available. Off-road diesel-powered construction equipment greater than 50 horsepower would meet new USEPA Tier 4 (final) off-road emissions standards or the next cleanest equipment available. Other measures would be implemented to further reduce fugitive dust generation and minimize use of portable generators for electrical power in favor of grid power where available. An independent monitor would track, verify, and report on the use of clean construction equipment and would quantify emissions benefits.

4.4 Lease Modifications

The proposed project would require modifications to the UAL lease. The project site is a portion of two existing UAL leasehold areas that abut one another on the east side of LAX, and the addition of an area that is not currently within a UAL leasehold. One of the two existing UAL leaseholds is for the existing UAL East Maintenance Facility and consists of approximately 32 acres. A second UAL leasehold lies on approximately 8.5 acres and is for the UAL cargo operation. The proposed project would also expand the UAL leaseholds to include an approximately 3-acre area located north of the existing hangar and associated parking; the area is currently used as a commercial shared-ride vehicle holding area for Super Shuttle and Prime Time vehicles.[15] The existing and proposed leasehold areas are illustrated in **Figure 10**.

[14] City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Sustainability Report 2015*. Available: http://www.laxsustainability.org/documents/Sustainability_Report_2015.pdf.

[15] LAWA is planning to relocate the shared-ride vans that currently use the holding lot to a parking area located on the north side of W. 111th Street (Parking Lot E), immediately east of the Proud Bird Food Bazaar and Events Center. This relocation is planned for Spring 2018 as part of ongoing operational changes at LAX. This relocation will occur independently of the proposed project.

LAX UAL East Aircraft Maintenance and GSE Project	Proposed Leasehold Modifications	Figure **10**

4.5 Project Operations

UAL currently conducts Line Maintenance (as opposed to Heavy Maintenance) at both the East and West Maintenance facilities at LAX. Line maintenance consists of routine, scheduled maintenance checks (referred to as A-checks and B-checks) and other routine maintenance activities. These types of checks normally occur over the course of a few hours, usually overnight when the aircraft is not in service. During some line checks, situations may be discovered that require the aircraft to undergo additional maintenance over a longer period of time. The reduction in the total building square footage and leasehold acreage associated with the proposed project would not alter the nature and type of aircraft maintenance, or the number of aircraft undergoing maintenance, at LAX. Rather, the consolidation would increase operational efficiency and would "right-size" the space to match the business operations.

5. NECESSARY APPROVALS

The City of Los Angeles has principal responsibility for approving the proposed project. Agencies and City entities which may be required to take actions associated with the proposed project include, but may not be limited to, the following:

Federal

- U.S. Department of Transportation Federal Aviation Administration (FAA)[16]

Regional

- South Coast Air Quality Management District

Local

- LAWA Board of Airport Commissioners
- City of Los Angeles City Council
- City of Los Angeles Department of Building and Safety
- City of Los Angeles Department of Public Works, Bureau of Sanitation
- City of Los Angeles Department of Planning, Office of Historic Resources
- Other Federal, State, or local approvals, permits, or actions may be necessary.

6. DOCUMENTS REFERENCED

Documents cited in the NOP/IS are available for public inspection at the following address:

Los Angeles World Airports
One World Way, Room 218
Los Angeles, California 90045

[16] While FAA is not a state agency regarding CEQA review, the proposed project would require approval of Form 7460-1 (Notice of Proposed Construction or Alteration) in consideration of Part 77 requirements.

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CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY
AND CHECKLIST

(Article IV City CEQA Guidelines)

LEAD CITY AGENCY	**COUNCIL DISTRICT**	**DATE**
Los Angeles World Airports (LAWA)	Council District 11	December 7, 2017

RESPONSIBLE AGENCIES

South Coast Air Quality Management District

PROJECT TITLE/NO.	**CASE NO.**
Los Angeles International Airport (LAX) United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project	***NP-17-007-AD***

PREVIOUS ACTIONS CASE NO.	☐ **DOES have significant changes from previous actions.** ☐ **DOES NOT have significant changes from previous actions.**

PROJECT DESCRIPTION: The proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX in light of an upcoming lease expiration for one of two existing UAL aircraft maintenance areas at LAX, which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Currently UAL performs maintenance in two areas at LAX: West Maintenance Facility (also known as the United Airlines Maintenance Facility, and formerly known as the Continental Airlines Aircraft Maintenance Hangar) and East Maintenance Facility (also known as the United Airlines Maintenance Operations Center or MOC). The West Maintenance Facility is located in the western portion of LAX, south of World Way West approximately 0.7 mile east of Pershing Drive, and the East Maintenance Facility is located south of Century Boulevard, approximately 0.45 mile east of Sepulveda Boulevard. UAL's lease of the West Maintenance Facility will expire in 2020. UAL proposes to vacate the western facility and redevelop their existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Once vacated by UAL, the West Maintenance Facility would remain vacant until such time as LAWA leases the facility to a tenant or proposes redevelopment of the site, which would be subject to its own environmental review and documentation, as appropriate. The proposed project would redevelop an approximately 37-acre site in the eastern portion of the airport operations area (AOA). With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. The proposed project would not affect the Quonset Hut; the facility would remain in its current location. With project implementation, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. The consolidation would alter on- and off-airport vehicular movements, as well as aircraft movements on the airfield. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility would instead drive to the East Maintenance Facility. Similarly, on the airfield, GSE and aircraft that currently travel on taxiways and taxilanes to access the West Maintenance Facility would instead travel to the East Maintenance Facility. The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not increase passenger or gate capacity.

ENVIRONMENTAL SETTING:

The project site includes an existing aircraft and GSE maintenance facility situated within the LAX AOA. The land use setting at and around the project site is characterized by airport operations, aircraft maintenance facilities, and air cargo facilities. Existing adjacent uses include: surface parking lot for shared ride vehicles and a 7-level parking structure to the north;

maintenance and air cargo facilities to the east; the LAX south airfield to the south; and air cargo and aircraft maintenance facilities, remain overnight (RON) aircraft parking positions, and a commuter terminal to the west.

PROJECT LOCATION

The project site is located within the eastern portion of LAX; specifically, south of Century Boulevard and east of Sepulveda Boulevard. LAX is situated within the City of Los Angeles, an incorporated city within Los Angeles County.

PLANNING DISTRICT	**STATUS:**
LAX Plan LAX Specific Plan	☐ **PRELIMINARY** ☐ **PROPOSED** ☒ **ADOPTED**
EXISTING ZONING LAX Zone: Airport Airside Subarea	☒ **DOES CONFORM TO PLAN**
PLANNED LAND USE & ZONE Airport-related airside uses; no change in zone is proposed	☐ **DOES NOT CONFORM TO PLAN**
SURROUNDING LAND USES North - Airport Airside (parking, shared-ride van holding lot) East - Airport Airside (maintenance and air cargo) South - Airport Airside (aircraft taxiways and runways) West – Airport Airside (air cargo, aircraft maintenance, commuter terminal, aircraft remain overnight parking)	☐ **NO DISTRICT PLAN**

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ 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.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ 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.

☐ 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.

Nina Haskew — **SIGNATURE**

CITY PLANNER — **TITLE**

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:
    a. the significance criteria or threshold, if any, used to evaluate each question; and
    b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will 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. These issues will be further analyzed in the EIR to determine if, in fact, the impact is significant. If the impact is determined to be significant in the EIR, the EIR will further determine if feasible mitigation is available that can reduce the impact to less than significant.

☐ Aesthetics	☐ Hazards and Hazardous Materials	☐ Public Services
☐ Agriculture and Forestry Resources	☐ Hydrology and Water Quality	☐ Recreation
☒ Air Quality	☐ Land Use and Planning	☒ Transportation/Traffic
☐ Biological Resources	☐ Mineral Resources	☐ Tribal Cultural Resources
☒ Cultural Resources	☐ Noise	☐ Utilities/Service Systems
☐ Geology and Soils	☐ Population and Housing	☒ Mandatory Findings of Significance
☒ Greenhouse Gas Emissions		

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

☞ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER***
LAWA – Maritza Lee	(800) 919-3766

PROPONENT ADDRESS

One World Way, Room 218, Los Angeles, California 90045

AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
LAWA	December 7, 2017

PROPOSAL NAME (If Applicable)*

LAX United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project

☞? ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state or city-designated scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒
II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:				
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?	☐	☐	☐	☒
b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
III. AIR QUALITY. Would the project:				
a. Conflict with or obstruct implementation of the applicable South Coast Air Quality Management District plans?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (PM_{10}, $PM_{2.5}$, and O_3 precursors [NOx and VOC]) under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES. Would the project:				
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, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, or	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☐	☒
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?	☐	☒	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Los Angeles Building Code (2002), creating substantial risks to life or property?	☐	☐	☒	☐
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?	☐	☐	☐	☒
VII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐
VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☒	☐
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 for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒
e. 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?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
X. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
XI. MINERAL RESOURCES. Would the project:				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial 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)?	☐	☐	☐	☒
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES. Would the project 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 public services:				
a. Fire protection?	☐	☐	☐	☒
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
XVI. TRANSPORTATION/TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and	☒	☐	☐	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
freeways, pedestrian and bicycle paths, and mass transit?				
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e. Result in inadequate emergency access?	☐	☐	☐	☒
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
XVII. TRIBAL CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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:	☐	☒	☐	☐
i) 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 §5020.1(k), or				

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) 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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?				
XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of 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?	☒	☐	☐	☐
b. Does the project have impacts which are 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).	☒	☐	☐	☐
c. Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

☞? **DISCUSSION OF THE ENVIRONMENTAL EVALUATION** **(Attach additional sheets if necessary)**

(See Attachment A)

ATTACHMENT A
EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS. *Would the project*:

a. Have a substantial adverse effect on a scenic vista?

No Impact. The project site is located within the eastern portion of LAX surrounded by airport uses and is not a prominent feature in any scenic vistas. Broad scenic views of the Santa Monica Mountains in the distance beyond LAX are available from some higher elevation locations to the south of LAX, including Interstate 105 (I-105) located approximately 0.70 mile south of the project site. The project site is part of the intervening development visible at a lower elevation between I-105 and the mountains. However, the project site is not visually distinct and does not detract from the mountain views. Moreover, the project site is not within the direct viewshed of north-facing residences in the City of El Segundo. The proposed project would replace the existing buildings with new buildings that are consistent with surrounding structures. Thus, from a distance, the proposed project would remain visually indistinct from surrounding development and would not contribute to, or detract from, distant views of or from the Santa Monica Mountains from higher elevations to the south, and would not alter existing long-range views of or from the Santa Monica Mountains. As such, the implementation of the proposed project would have no adverse effect on views of or from the Santa Monica Mountains (i.e., a scenic vista). Therefore, the proposed project would not have a substantial adverse effect on a scenic vista. Implementation of the proposed project would have no impact related to a scenic vista and no further evaluation in the EIR is required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state or city-designated scenic highway?

No Impact. The project site includes existing hangars, GSE maintenance facilities, and paved areas used for RON, maintenance activities, and vehicle parking. The project site is not located adjacent to or within the viewshed of a designated scenic highway. The nearest officially designated state scenic highway is approximately 22 miles northwest of the proposed project site (State Highway 2, from approximately 3 miles north of Interstate 201 in La Cañada to the San Bernardino County Line).[17] The nearest eligible state scenic highway (which is not officially designated by the state) is State Highway 1, with a southerly starting point at Lincoln and Venice Boulevards, approximately 5 miles from the project site, proceeding northwesterly to Point Mugu.[18] The southerly portion of this state-eligible scenic highway is a City-designated scenic highway. Vista del Mar, the nearest City-designated scenic highway, is located approximately

[17] 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, accessed November 21, 2017.

[18] 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, accessed November 21, 2017.

2.9 miles west of the project site.[19] The project site is not visible from State Highway 1 or Vista del Mar. There are no direct views to or from any scenic highways.

The Los Angeles/El Segundo Dunes are located approximately 2.5 miles west of the project site, between Pershing Drive and Vista del Mar. The project site is not visible from the dunes and the proposed project would not obstruct any views of the dunes. The proposed project is not located within the viewshed of any other scenic resources or other locally recognized desirable aesthetic natural feature. Moreover, the project site does not contain any trees, rock outcroppings, or other locally recognized desirable aesthetic natural features within a City-designated scenic highway. The proposed project would not substantially damage scenic resources, including scenic highways.

Therefore, no impact on scenic resources within a state or City-designated scenic highway, including trees, landscaping, historical buildings, or other locally recognized desirable aesthetic natural features, would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

The potential for the proposed project to result in substantial adverse change in the significance of a historical resource is detailed below in Section V.a.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

No Impact. The project site is a highly-developed area within a busy international airport. The proposed project site includes existing structures used for aircraft and GSE maintenance and paved areas used for aircraft parking and maintenance. The land use setting around the project site is generally characterized by airport operations, including air cargo, aircraft and GSE maintenance, commuter terminal operations, and aircraft and vehicle parking, which are utilitarian and industrial in character. Given the distance of the project site from the airport boundaries, as well as intervening topography and structures such as buildings and fences, the project site is not visually prominent from locations beyond the airport boundaries (see Figures 3 and 4). Further, views of the airport facilities on the east side of the airport are not scenic or of high quality visual character. The proposed project would redevelop the project site with the same uses as currently exist on the project site.

The visual character and quality of the proposed facility would not be degraded and would continue to be visually compatible with existing airport facilities in the project vicinity. Therefore, no impact on the existing visual character or quality of the site and its surroundings would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. The project site is in an urban area with many existing sources of ambient lighting, including street lights and lighting of the airfield and other airport facilities. Existing

[19] City of Los Angeles, Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, Appendix B: Inventory of Designated Scenic Highways and Guidelines, as adopted by City Council on September 7, 2016. Available: http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf.

lighting at the project site includes lighting of the buildings, parking and other maintenance facilities. As with surrounding facilities, the site is operational 24-hours a day and is lighted accordingly. The site is internal to the airport and has minimal visibility from off-airport locations (see Figure 4).

Similar to the existing facility, new lighting associated with the proposed project would include security lighting on the new buildings, parking lot lighting, and lighting of the outdoor maintenance areas. External lights would be shielded and focused to avoid glare and prevent unnecessary light spillover. The project site is in an industrial area of the airport with existing light sources that include roadway, building, perimeter fence, and airfield lighting. The new light sources would be consistent with existing light sources and lighting levels and would not substantially change the ambient lighting levels in the area. Therefore, implementation of the proposed project would not have the potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. No impacts related to light and glare would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

II. AGRICULTURE AND FORESTRY RESOURCES. *Would the project:*

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?

b. Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Result in the loss of forest land or conversion of forest land to non-forest use?

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?

a-e. No Impact. The project site is located within a developed airport and is surrounded by airport uses and urbanized areas. There are no agricultural resources or operations at the project site or surrounding areas, including prime or unique farmlands or farmlands of statewide local importance. Further, there are no Williamson Act contracts in effect for the project site or surrounding areas.[20] The proposed project would represent a continuation of the current airport-related uses and would not convert farmland to non-agricultural use nor would it result in any conflicts with existing zoning for agricultural use or a Williamson Act contract.

There are no forest land or timberland resources or operations within the vicinity of the project site, including timberland zoned Timberland Production. The proposed project would be consistent with the current airport-related uses and would not convert forest land or timberland

[20] City of Los Angeles, Department of City Planning, *Conservation Element of the City of Los Angeles General Plan*, Exhibit B2, SEAs and Other Resources, January 2001.

to non-forest. Therefore, no impacts to agricultural or forest land or timberland resources would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

III. AIR QUALITY. *Would the project:*

a. Conflict with or obstruct implementation of the applicable South Coast Air Quality Management District plans?

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (PM_{10}, $PM_{2.5}$, and O_3 precursors [NOx and VOC]) under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

d. Expose sensitive receptors to substantial pollutant concentrations?

a-d. Potentially Significant Impact. Air pollutant emissions associated with construction and operation of the proposed project may exceed the South Coast Air Quality Management District (SCAQMD) CEQA significance thresholds, which would violate air quality standards or contribute to an existing air quality violation. The EIR for the proposed project will evaluate whether construction and operation of the proposed project would: (1) conflict with or obstruct implementation of the applicable SCAQMD plans; (2) violate any air quality standard or contribute substantially to an existing or projected air quality violation; (3) result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (PM_{10}, $PM_{2.5}$, and O_3 precursors [NOx and VOC]) under an applicable federal or state ambient air quality (including releasing emissions which exceed quantitative thresholds for ozone precursors); and/or (4) expose sensitive receptors to substantial pollutant concentrations. The construction analysis will consider emissions from construction equipment, haul trucks, and construction worker commuting trips; fugitive emissions of volatile organic compounds (VOCs) from architectural coating; and fugitive dust from soil handling, grading, and paved roads. The operational analysis will focus on the shift of maintenance activities from the west side of the airport to the east side of the airport, including increased engine run ups, aircraft and GSE movement, and operational employee commuting trips on the east side of the airport.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. The use of diesel equipment during construction would generate near-field odors that are considered to be a nuisance. Diesel equipment emits a distinctive odor that may be considered offensive to certain individuals. The closest sensitive receptors to the project site are hotels to the north on the north side of Century Boulevard, the closest being the LAX Crowne Plaza Hotel located at 5985 W. Century Boulevard, approximately 450 feet to the north. Due to the temporary nature of construction activities, as well as existing intervening structures (a parking structure and cargo/maintenance buildings), odors from construction-related diesel exhaust would not affect a substantial number of people. The project site is located in the eastern portion of LAX characterized by airport operations, including air cargo, maintenance facilities, commuter terminal operations, and aircraft and vehicle parking.

The proposed project would result in the continuation of aircraft and GSE maintenance activities on the project site and would not notably change existing odors at or in the vicinity of the project site associated with existing aircraft and maintenance equipment operations. Therefore, operation of the proposed project would not create objectionable odors affecting a substantial number of people and no further analysis in the EIR is required.

IV. BIOLOGICAL RESOURCES. *Would the project:*

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, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The project site, including the proposed construction staging area that would be located onsite, is located in a highly-developed area within the east side of LAX that is completely devoid of biological resources, with the exception of two ornamental trees located in small isolated landscape pockets adjacent to the existing hangars. While other areas within the airport boundary contain plant and animal species as well as habitats identified as sensitive, no sensitive plant or animal species have been identified on or near the project site. Therefore, the proposed project would have no impacts to sensitive or special status species nor to habitats and, thus, no further evaluation in the EIR is required.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

b-c. No Impact. There are no riparian/wetland areas or wildlife movement corridors at or near the project site. Therefore, no impacts to any riparian or other sensitive natural community or to any federally protected wetlands as defined by Section 404 of the Clean Water Act would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

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?

No Impact. As noted above, the project site is located in a highly-developed area within the east side of LAX that is completely devoid of biological resources with the minor exception of two ornamental trees located in small isolated landscape pockets adjacent to the existing hangars. That is also largely the case for the areas surrounding the project site, which are devoid of biological resources, with the exception of some ornamental landscaping along Avion Drive. The ornamental trees located on the project site would be removed as part of the proposed project. Because the trees are isolated and few in number, implementation of the proposed project would not 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 and no further evaluation in the EIR is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

No Impact. There are no native trees, including trees protected by City of Los Angeles Ordinance No. 177404 (i.e., oak trees indigenous to California [excluding Scrub Oak], Southern California Black Walnut, Western Sycamore, or California Bay) at or adjacent to the project site. In addition, neither of the two ornamental trees located in the small isolated landscape pockets adjacent to the existing hangars are located within a public right-of-way. Removal of the two existing ornamental trees would not be subject to permitting requirements for street tree removal under Los Angeles Municipal Code, Chapter VI, Sections 62.169 and 62.170. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance, and no further evaluation in the EIR is required.

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?

No Impact. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that includes the project site. The Dunes Specific Plan Area (i.e., Los Angeles/El Segundo Dunes), a designated Los Angeles County Significant Ecological Area, is located in the western portion of LAX, approximately 2.5 miles west of the project site, opposite Pershing Drive. The Dunes area is well removed from the project site and would not be affected by the proposed project. Therefore, 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 and no further evaluation in the EIR is required.

V. CULTURAL RESOURCES. *Would the project:*

a. Cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines §15064.5?

Potentially Significant Impact. The proposed project would require the demolition of the existing maintenance hangars on the project site (6000–6016, 6020–6024 Avion Drive). These two hangars are two of the three remaining buildings of the Intermediate Terminal Facility, the third building being 6040 Avion Drive located northwest of the project site. The Intermediate Terminal Facility was constructed between 1945 and 1947 to temporarily house airport administration and airline offices, passenger terminals, hangars, and aircraft service facilities. The Intermediate Terminal Facility buildings lined Avion Drive, which looped around a central surface parking lot south of Century Boulevard. The facility originally consisted of four wood-frame buildings: one housing the airport administration, weather service, and Civil Aeronautics Administration; and the other three serving as passenger terminals. Additional buildings were constructed by airlines for their own offices and hangars. The three surviving buildings are part

of the latter group. Each originally consisted of two stories of airline administrative offices facing Avion Drive, with hangars behind.

The surviving Intermediate Terminal Facility buildings represent an important milestone in the evolution of LAX. The grouping is therefore significant under National Register Criterion A, California Register Criterion 1, and Los Angeles Historic-Cultural Monument criteria for its association with events that have made a significant contribution to the broad patterns of Los Angeles history. Two of the buildings, 6000–6016 and 6020–6024 Avion Drive (on the project site), have undergone some alterations but retain a good degree of integrity. The third building, 6040 Avion Drive (northwest of the project site), which was originally the headquarters of Western Airlines, has been extensively altered with large additions at the rear and a complete reconstruction of its primary façade, and therefore no longer retains sufficient integrity to convey its historic significance.

Because of the prior demolition of the majority of the Intermediate Terminal Facility buildings, including the passenger terminals, and alterations to the remaining buildings, especially the extensive alterations to 6040 Avion Drive, the surviving grouping does not retain sufficient integrity for listing in the National Register. However, resources lacking sufficient integrity for listing in the National Register may still be eligible for listing in the California Register. The grouping of the two intact, surviving Intermediate Terminal Facility buildings at 6000–6016 and 6020–6024 Avion Drive (on the project site) retains sufficient integrity to convey its historic significance and is therefore eligible for listing in the California Register and as a Los Angeles Historic-Cultural Monument.[21]

In addition to the Intermediate Terminal Facility buildings, the existing East Maintenance Facility site includes a Quonset Hut, which is located northwest of Hangar 1. The Quonset Hut is a semi-cylindrical structure constructed of corrugated steel sheeting placed atop arched metal rib framing. This type of structure was widely-used by the military during World War II; due to their portability and versatility, many World War II-era Quonset Huts were adapted for a wide variety of everyday peacetime uses after the war. The Quonset Hut at the project site is believed to have been placed there by 1950. Due to its historic significance, rarity of building type, and good level of integrity, the Quonset Hut onsite is eligible for listing in the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument.[22] As identified in Section 4, *Project Description*, the proposed project would not alter the Quonset Hut. Moreover, a 15-foot buffer would be established around the Quonset Hut during construction to ensure its protection. Please see Section XII below for a discussion of potential construction equipment vibration impacts on the Quonset Hut from construction of the proposed project. As noted in

[21] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, *(SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20H.pdf.

[22] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20H.pdf.

that discussion, vibration from project construction would not have a significant impact on the Quonset Hut.

The proposed project EIR will evaluate whether the proposed project would cause a substantial adverse change in the significance of a historical resource as defined in the State CEQA Guidelines Section 15064.5. Specifically, the EIR will evaluate the potential for impacts to the Intermediate Terminal Facility. No further evaluation of the Quonset Hut in the EIR is required.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Unless Mitigation Incorporated. The LAX Master Plan Final EIR identified 36 previously recorded archeological sites within a radius of approximately 2 miles of LAX, including eight sites located on LAX property.[23] None of the eight sites identified on LAX property are located within the boundaries of the project site or in the immediate vicinity. Results of the records search conducted for the LAX Landside Access Modernization Program from the South Central Coastal Information Center (SCCIC) indicated no archaeological resources have been recorded at or within a half-mile radius of the proposed LAX UAL East Aircraft Maintenance and GSE Project site.[24] The project site is a highly disturbed area that has long been, and is currently being, 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. While discovery of archaeological resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could impact previously unknown buried archaeological resources that fall within the definition of historical resources or unique archaeological resources. Thus, impacts to archaeological resources from construction activities could be significant. Operations of the proposed project would not have the potential to impact archaeological resources.

LAWA has developed standard control measures addressing impacts to archaeological resources. The following LAX standard control measures would be implemented as mitigation measures during construction of the proposed project:

- **LAX-AR-1. Conformance with LAWA's Archaeological Treatment Plan.**[25]

  Prior to initiation of any project-related grading or excavation activities, LAWA shall retain an on-site Cultural Resource Monitor (CRM), as defined in LAWA's Archaeological

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

[24] The study area for the archaeological and paleontological resources assessment for the LAX Landside Access Modernization Program included areas within and to the east of the CTA, some of which are adjacent to the project site; refer to Figure 2 in City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix I, Archaeological and Paleontological Resources Assessment Report, prepared by PCR Services Corporation, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf.

[25] City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting* Program*: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005. Available: http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Archaeological_Treatment_Plan.pdf.

Treatment Plan (ATP), who will determine if the proposed project is subject to archaeological monitoring. Monitoring, if required, will be subject to the provisions identified below.

Monitoring Requirements. In accordance with the ATP, the CRM will compare the known depth of redeposited fill or disturbance to the depth of planned grading activities, based on a review of construction plans that provide details about the extent and depth of project-related grading and other development-related data, such as geotechnical investigations that include soils borings and delineation of subsurface strata types. If the CRM determines that all or specific portions of the proposed project area warrant archaeological monitoring during grading activities, a qualified archaeologist shall be retained by LAWA to inspect excavation and grading activities that occur within native material.

Identification, Evaluation, and Recovery. Should archaeological resources be discovered, preservation in place is the preferred manner for mitigating impacts to archaeological sites. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.

Reporting and Curation. Reporting shall be completed in conformance with the guidelines set forth by the Office of Historic Preservation for Archaeological Research Management Reports and requirements established in the ATP. Proper curation and archiving of artifacts shall be conducted in accordance with industry and federal standards and as outlined in the ATP.

- **LAX-AR-2. Archaeological Resources Construction Personnel Briefing.**
  Prior to initiation of grading activities, LAWA shall require the consulting archaeologist to provide construction personnel with a briefing in the identification of archaeological resources and in the correct procedures for notifying the relevant individuals should such a discovery occur.

With implementation of Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2, potentially significant impacts to archaeological resources that are historical resources or unique archaeological resources would be less than significant and no further evaluation in the EIR is required.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Unless Mitigation Incorporated. The LAX property lies in the northwestern portion of the Los Angeles Basin, a broad structural syncline with a basement of older igneous and metamorphic rocks overlain by thick younger marine and terrestrial deposits. The older deposits that underlie the LAX area are assigned to the Palos Verdes Sand formation. The Palos Verdes Sand formation is one of the better-known Pleistocene age deposits in southern California. The unit was deposited in a shallow sea that covered the region some 124,000 years ago. These deposits have a high potential for yielding unique paleontological deposits. The

Palos Verdes Sand formation covers half of the LAX area, beginning at Sepulveda Boulevard and extending easterly beyond the airport.[26]

The records search conducted for the LAX Landside Access Modernization Program from the Vertebrate Paleontology Department at the Natural History Museum of Los Angeles County (NHMLAC) indicated that there were no known paleontological localities within the vicinity of the proposed project.[27] As mentioned previously, the project site is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities that have likely displaced surficial paleontological resources. While discovery of paleontological resources in artificial fill deposits within the project area is unlikely, proposed excavations at the project site could impact intact, unique paleontological resources that have not been disturbed or displaced by previous development. Since the proposed project would include excavations of varying depths across portions of the project site, the proposed project could impact previously unknown buried unique paleontological resources. Thus, impacts to paleontological resources could be significant.

LAWA has developed standard control measures addressing impacts to paleontological resources. The following LAX standard control measures would be implemented as mitigation measures during construction of the proposed project:

- **LAX-PR-1. Conformance with LAWA's Paleontological Management Treatment Plan (PMTP).**[28]

  Prior to initiation of grading activities, LAWA shall retain a professional paleontologist. If the project site is determined to exhibit a high potential for paleontological resources, paleontological monitoring shall be conducted by a professional paleontologist. If the project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP.

  Monitoring Requirements. In accordance with the PMTP, LAWA shall supply the paleontological monitor (PM) with a construction schedule and any construction, grading, excavation and/or shoring plans, along with access to relevant geotechnical studies prior to the initiation of ground-disturbing activities. If excavation activities are scheduled to go below the documented level of fill materials, paleontological monitoring shall be initiated when formational sediments are expected to be reached by earthmoving activities.

[26] City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, *(SCH 1997061047)*, Section 4.9.2 – Paleontological Resources, April 2004.

[27] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, *(SCH 2015021014)*, Appendix I, Archaeological and Paleontological Resources Assessment Report, Prepared by PCR Services Corporation, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20I.pdf.

[28] City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Paleontological Management Treatment Plan*, prepared by Brian F. Smith and Associates, December 2005. Available: http://www.lawa.org/ourLAX/AnnualReports.aspx?id=8067.

Identification, Evaluation, and Recovery. The PM or PM designee shall identify, evaluate, and recover paleontological resources in accordance with the relevant provisions of the PMTP.

- **LAX-PR-2. Paleontological Resources Construction Personnel Briefing.**

  Prior to initiation of grading/ground-disturbing activities, LAWA shall require the PM or PM designee to brief project engineers, project inspectors, construction foreman, drillers and heavy equipment operators in the identification of fossils or fossiliferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur.

With implementation of Standard Control Measures (Mitigation Measures) LAX-PR-1 and LAX-PR-2, potentially significant impacts to unique paleontological resources would be less than significant and no further evaluation in the EIR is required.

d. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed in Section XVII (Tribal Cultural Resources) below, a Sacred Lands File (SLF) records search from the California Native American Heritage Commission (NAHC) did not find any records pertaining to the presence of Native American cultural resources from the NAHC archives within the project area or surrounding vicinity (although the absence of specific site information in the SLF does not indicate the absence of Native American cultural resources). As stated above, the project site is located within a highly urbanized area and has been subject to disturbance by airport operations and development. Thus, surficial human remains resources that may have existed at one time have likely been displaced by these disturbances. While discovery of human remains in artificial fill deposits within the project area is unlikely, proposed excavations could impact previously unknown buried human remains. However, LAWA would comply with existing guidance as to the treatment of any human remains that are encountered during construction excavations, including the procedures outlined in Sections 7050.5(b) and (c) of the State Health and Safety Code, and Sections 5097.94(k) and (i) and Sections 5097.98(a) and (b) of the Public Resources Code. Therefore, through compliance with state and local regulations, impacts from disturbance of any human remains, including those interred outside of formal or dedicated cemeteries, would be less than significant and no further evaluation in the EIR is required.

VI. GEOLOGY AND SOILS. *Would the project:*

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Fault rupture is the surface displacement that occurs along the surface of a fault during an earthquake. The project site is located within the seismically active southern California region; however, there is no evidence of faulting on the project site, and it is not located within a State of California Earthquake Fault Zone (formerly known as an Alquist-Priolo Special Study Zone).[29] Geotechnical literature indicates that the Charnock Fault, a potentially active fault, may be located near or through the eastern portions of LAX property (the proposed project site is located approximately 0.3 mile west of the inferred fault line [i.e., the inferred fault line represents a southerly extension of Charnock Fault Trend, which is mapped approximately 3 miles north of the airport]). However, evaluation indicates that the Charnock Fault is considered to have low potential for surface rupture independently or in conjunction with movement on the Newport-Inglewood Fault Zone, which is located approximately 3 miles east of LAX.[30]

Implementation of the proposed project would include demolition of existing structures at the East Maintenance Facility, many of which were built in the late 1940s, which would be replaced with new structures that meet current building code seismic requirements. Specifically, the design and construction of the proposed project would comply with current Los Angeles Building Code (LABC) and Uniform Building Code (UBC) requirements to reduce potential risks associated with fault rupture or strong seismic ground shaking. As such, implementation of the proposed project would place workers and maintenance activities within new buildings that are better designed and constructed for potential seismic events as compared to the buildings that currently exist at the project site. Similarly, the proposed relocation of workers and activities from the West Maintenance Facility to the East Maintenance Facility would place those workers and activities in newer structures, designed to current seismic standards, as compared to the existing structures within the West Maintenance Facility. As such, potential impacts to people or structures to substantial adverse effects resulting from rupture of a known earthquake fault or strong seismic ground shaking would be less than significant with the implementation of the proposed project and no further evaluation in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a seismic hazard that occurs when strong ground shaking causes saturated granular soil (such as sand) to liquefy and lose strength. The susceptibility of soil to liquefy tends to decrease as the density of the soil increases and the intensity of ground shaking decreases. Liquefaction potential is greatest where the groundwater levels are shallow and where submerged loose, fine sands occur within a depth of about 50 feet or less. The groundwater table below the eastern portion of LAX (where the project site is

[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, April 2004.

[30] 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, April 2004.

located) is at a depth of approximately 90 feet below ground surface.[31] This groundwater depth indicates that the site has a very low susceptibility to liquefaction.[32]

Strong ground shaking will also tend to compact loose to medium dense deposits of partially saturated granular soils and could result in seismic settlement of foundations and the ground surface at LAX. Due to variations in material type, seismic settlements would tend to vary considerably across LAX, but are generally estimated to be between negligible and 0.5 inch; the overall potential for damaging seismically-induced settlement is considered to be low.[33]

Seismically-induced ground shaking can also cause slope-related hazards through various processes including slope failure, lateral spreading, flow liquefaction, and ground lurching.[34,35] Because the project site is flat, there is no potential for slope failures at the project site.

The California Department of Conservation (CDC) is mandated by the Seismic Hazards Mapping Act of 1990 to identify and map the state's most prominent earthquake hazards in order to help avoid damage resulting from earthquakes.[36] The CDC's Seismic Hazard Zone Mapping Program charts areas prone to liquefaction and earthquake-induced landslides throughout California's principal urban and major growth areas. According to the Seismic Hazard Map for the Inglewood Quadrangle, no potential liquefaction zones are located within the LAX area. Isolated zones of potential seismic slope instability are identified within the dunes area to the west of the proposed project site.[37] Given the flat topography of the project site, it would not be subject to slope instability and the potential instability within the dune area to the west would not pose a risk to the project site.

In summary, the potential for seismic-related ground failure at the proposed project site due to liquefaction is considered low. All construction would be designed in accordance with the provisions of the UBC and the LABC. In addition, the proposed project would not increase

[31] United Airlines, *Human Health Risk Assessment United Airlines Maintenance Operations Center Los Angeles International Airport*, prepared by Environmental Resources Management (ERM), January 2011.

[32] 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, April 2004.

[33] 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, April 2004.

[34] Lateral Spreading: Deformation of very gently sloping ground (or virtually flat ground adjacent to an open body of water) that occurs when cyclic shear stresses caused by an earthquake induce liquefaction, reducing the shear strength of the soil and causing failure and "spreading" of the slope.

[35] Ground Lurching: Ground lurching (and related lateral extension) is the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of earthquake-induced ground shaking. Damage includes lateral movement of the slope in the direction of the slope face, ground cracks, slope bulging, and other deformations.

[36] California Public Resources Code 2690-2699.6. Seismic Hazards Mapping Act.

[37] 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, April 2004.

passenger capacity or long-term employment at LAX and, therefore, would not increase exposure of people or structures to substantial adverse risks or exacerbate risks associated with seismic-related ground failure. Potential impacts associated with seismic-related ground failure, including liquefaction, would be less than significant with the implementation of the proposed project and no further evaluation in the EIR is required.

iv. Landslides?

No Impact. The project site and vicinity are relatively flat and are primarily surrounded by existing airport and urban development. Furthermore, the City of Los Angeles Landslide Inventory and Hillside Areas map does not identify any areas in the vicinity of the project site that contain unstable slopes which may be prone to seismically-produced landslides.[38] Implementation of the proposed project would not result in the exposure of people or structures to the risk of landslides or exacerbate landslide risks during a seismic event. Therefore, no impacts resulting from landslides would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

b. Result in substantial soil erosion or the loss of topsoil?

No Impact. The project site has flat topography and consists almost entirely of impervious surfaces (asphalt and structures) with the exception of two small isolated landscape pockets adjacent to the existing hangars; therefore, no soil erosion and loss of topsoil on the project site is expected to occur. The proposed project would result in the demolition of existing pavement on the project site, as well as excavation and use of fill during construction. The proposed project would not involve any physical alteration to the West Maintenance Facility; therefore, conditions would remain the same even after United Airlines vacates and ceases its maintenance activities there. LAWA would comply with LABC Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill. Compliance with these requirements would reduce the potential for wind or waterborne erosion. In addition, the LABC requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season (between November 1 and April 15), and the state MS4 Construction General Permit requires the preparation of a construction Stormwater Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) including erosion and sedimentation control measures for ground disturbance of one acre or more. As a result, the proposed project would not result in substantial soil erosion. Based on the above, no impacts related to soil erosion and the loss of topsoil would occur and no further evaluation in the EIR is required.

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?

Less Than Significant Impact. Settlement of foundation soils beneath engineered structures or fills typically results from the consolidation and/or compaction of the foundation soils in response to the increased load induced by the structure or fill. The presence of

[38] 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.

undocumented and typically weak artificial fill at LAX creates the potential for settlement.[39] The Lakewood Formation also includes some silt and clay layers prone to settlement. However, foundation design features and construction methods can reduce the potential for excessive settlement at LAX, including the project site, and the overall potential for damaging settlement is considered low.[40] Therefore, implementation of the proposed project would not adversely affect 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 landslides, lateral spreading, subsidence, liquefaction, or collapse. The potential impact would be less than significant with the implementation of the proposed project and no further evaluation in the EIR is required. See also Sections VI.a.iii and VI.a.iv above.

d. Be located on expansive soil, as defined in Table 18-1-B of the Los Angeles Building Code (2002), creating substantial risks to life or property?

Less Than Significant Impact. Expansive soils are typically composed of certain types of silts and clays that have the capacity to shrink or swell in response to changes in soil moisture content. Shrinking or swelling of foundation soils can lead to damage to foundations and engineered structures including tilting and cracking. Fill materials located in some portions of the LAX area could be prone to expansion, and some portions of the Lakewood Formation found beneath the eastern portion of LAX may also be susceptible, due to their higher content of clay and silt.[41] The new building area that would be constructed as part of the proposed project could be subject to the effects of expansive soils. As project construction would occur in accordance with LABC Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and foundation work, the potential for hazards to occur as a result of expansive soils would be minimized. The design and construction of the proposed project would comply with current UBC requirements and would not result in any structural or engineering modifications that could increase exposure of people or structures to risk associated with expansive soils. The potential impact would be less than significant with the implementation of the proposed project and no further evaluation in the EIR is required.

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?

No Impact. The project site is located in an urbanized area where wastewater infrastructure is currently in place. The proposed project would not use septic tanks or alternative

[39] 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, April 2004.

[40] 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, April 2004.

[41] 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*;* I City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, Technical Report 12, Earth/Geology, April 2004.

wastewater disposal systems. Therefore, no impacts related to the ability of onsite soils to support septic tanks or alternative wastewater systems would occur with implementation of the proposed project and no further evaluation in the EIR is required.

VII. GREENHOUSE GAS EMISSIONS. *Would the project:*

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

a-b. Potentially Significant Impact. Construction of the proposed project would generate greenhouse gas (GHG) emissions from vehicle exhaust associated with construction-related activities, including off-road construction equipment, construction worker commuting, and haul/vendor truck trips. During operations, the proposed project would generate GHG emissions from engine run ups, aircraft and GSE movement, and vehicle exhaust, as well as indirect GHG emissions from energy use associated with lighting and HVAC equipment. The potential for the proposed project to (1) generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; and/or (2) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHGs will be evaluated in the EIR.

VIII. HAZARDS AND HAZARDOUS MATERIALS. *Would the project:*

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The proposed project would not result in any material changes in the use of hazardous materials. No construction activities would occur at the West Maintenance Facility and, following completion of construction on the east facility, United Airlines would vacate the West Maintenance Facility and cease its maintenance activities there. The project site on the eastern portion of the airport includes two primary buildings (Hangars 1 and 2) that were historically used as aircraft hangars but also contain various offices, shops, storage areas, and vehicle servicing bays. Construction and operation of the proposed project would involve some use of hazardous materials, including vehicle fuels, oils, transmission fluids, cleaning solvents, and architectural coatings, similar to those typically found at construction sites, as well as those hazardous materials used at the existing maintenance and GSE facilities. These types of materials are not acutely hazardous, and storage, handling, and disposal of these materials are strictly regulated. Compliance with existing federal, state and local regulations and routine precautions would reduce the potential for accidental releases of a hazardous material to occur and would minimize the impact of an accident should one occur.

Proposed project operations would be similar to current operations at the East Maintenance Facility site. The proposed project would reduce the total building square footage and leasehold acreage associated with UAL's maintenance activities, but would not alter the nature and type of aircraft maintenance, or the number of aircraft undergoing maintenance, at LAX. Rather, the consolidation would increase operational efficiency and would "right-size" the space to match the business operations. Therefore, impacts from the implementation of the

proposed project associated with the routine use, transport, and disposal of hazardous materials would be less than significant and no further evaluation in the EIR is required.

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?

Less Than Significant Impact. Upset and accident conditions involving the release of hazardous materials into the environment could occur at the project site due to inadvertent releases of hazardous materials, environmental exposure to hazardous building materials during construction, and potential impacts associated with existing soil and groundwater contamination on the project site.

Inadvertent Releases

Inadvertent releases of hazardous or regulated materials on construction sites are typically localized and would be cleaned up in a timely manner. LAWA inspectors are present on construction sites at LAX throughout construction. In addition, other LAWA-authorized personnel routinely visit and inspect construction sites. Further, proper containment, spill control, and disposal of hazardous waste associated with potential releases of hazardous or regulated substances during construction and operation would be addressed through compliance with existing regulations, including the Emergency Planning and Community Right-to-Know Act which provides requirements for emergency release notification, chemical inventory reporting, and toxic release inventories for facilities that handle chemicals; the California Hazardous Materials Release Response Plans and Inventory Law, which requires the development of detailed hazardous materials inventories used and stored onsite, a program of employee training for hazardous materials release response, and the identification of emergency contacts and response procedures; and the California Hazardous Waste Control Law, which regulates the generation, transportation, treatment, storage, and disposal of hazardous waste.[42] Additionally, as discussed in Section IX below, the use of construction BMPs implemented as part of a SWPPP would minimize potential adverse effects to the general public and environment from inadvertent releases during construction. In accordance with the State Water Resource Control Board's (SWRCB) Construction General Permit, temporary construction BMPs specified in Construction SWPPPs at LAX include, but are not limited to, the following: material transfer practices; waste management practices; roadway cleaning/tracking control practices; vehicle and equipment practices; and fueling practices.[43]

[42] 42 United States Code, Section 116 et seq., *Emergency Planning and Community Right-to-Know Act*. Available: https://www.gpo.gov/fdsys/pkg/USCODE-2011-title42/html/USCODE-2011-title42-chap116.htm; California Health and Safety Code, Division 20, Chapter 6.9.5, *Hazardous Materials Release Response Plans and Inventory Law*. Available: http://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.95.&article=1; 22 California Code of Regulations, Section 66260 et. seq., *Hazardous Waste Control Law*. Available: http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/.

[43] State Water Resources Control Board, Division of Water Quality, *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, complete download with Attachment and Appendices updated January 23, 2013.

With these practices, implementation of the proposed project would not create a significant hazard to the public or the environmental through reasonably foreseeable, but inadvertent, upset and accident conditions involving the release of hazardous materials into the environment. Impacts related to inadvertent releases would be less than significant and no further evaluation in the EIR is required.

Hazardous Building Materials

Construction of the proposed project would require the demolition and removal of existing buildings at the East Maintenance Facility. Past investigations have confirmed the presence of ACM in the hangars, including sheet flooring with backing, roofing materials, spray-applied acoustic ceiling material, thermal system insulation, wallboard and concrete panels along the exterior walls, as well as caulk, joint compound, and window putty. Some of the ACM has been removed during previous remodeling activities.[44,45] In addition, lead-based paint (LBP) has been detected in both hangars and polychlorinated biphenyls (PCB) have been detected in onsite transformers.[46]

In addition to ACM, due to the age of the buildings, other materials of potential concern in onsite structures include, but are not limited to, electrical transformers (possible PCB-containing oils); fluorescent light bulbs (possible mercury); fluorescent light ballasts (possible PCB-containing oils); high intensity light bulbs (possible mercury); thermostat switches (possible liquid mercury and/or batteries); emergency lighting and exit signs (possible lead acid or other metal containing batteries or tritium); and heating, ventilation, and air conditioning (HVAC) and refrigeration systems (possible chlorofluorocarbon [CFC] gas).

In accordance with LAWA standard practices for development projects at LAX and with City requirements that mandate compliance with California Health and Safety Code requirements, prior to the issuance of any permit for the demolition of the existing maintenance facility hangars, LAWA would provide a letter to the Los Angeles Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present in the building.[47,48] Appropriate protective and materials management measures would be implemented during abatement and demolition of the buildings in accordance with applicable

Available: https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf.

44 Environmental Resources Management (ERM), *Asbestos-Containing Material (ACM) Survey Report – United Airlines Maintenance Operations Center, Los Angeles International Airport*, November 12, 2010.

45 Environmental Resources Management (ERM), *Draft Asbestos Abatement Report – United Airlines Maintenance Operations Center, Los Angeles International Airport*, June 3, 2011.

46 City of Los Angeles, Los Angeles World Airports, *LAX - Phase I Environmental Site Review - United Airlines Maintenance Operations Center (Lease LAA- 7264), 6000 - 6024 Avion Drive, Los Angeles, CA 90045*, Memorandum from Robert D. Freeman, Environmental Services Division, to Julia Mo, Commercial Development Group, April 10, 2013.

47 City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Design Standards & Guide Specifications – General Requirements*, July 2017. Available: http://www.lawa.org/uploadedFiles/LAXDev/DCH/2017/Design_Stds/Division%2001%20July%202017.pdf.

48 City of Los Angeles, Department of Building and Safety, *Information Bulletin/Public - Building Code Document No. P/BC 2017-067, Asbestos Notification for Demolition/Alteration Permits*, Effective January 1, 2017.

federal, state, and local health and safety requirements. Specifically, SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules; ACM handling and clean-up procedures; and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). The federal Occupational Safety and Health Act (OSHA) and California Occupational Safety and Health Act (CalOSHA) regulations, specifically 8 CCR §1529 and 8 CCR §1532.1, would also apply to the abatement and disposal of hazardous building materials such as ACM and LCS.[49,50] Compliance with these existing regulations would limit worker and environmental risks by requiring notification to employees who work in the vicinity of hazardous materials; controlling site access; requiring use of personal protective equipment; specifying demolition/renovation procedures, housekeeping controls, training and, in some cases, air monitoring and medical surveillance to reduce potential exposure; and requiring that materials be disposed of or recycled by licensed abatement contractors. CalOSHA also requires preparation of an Injury and Illness Prevention Program, which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication.

Additionally, construction work would be required to comply with LAWA's Design and Construction Handbook, which specifies that all requirements of environmental regulatory agencies be complied with, including but not limited to the federal and state Environmental Protection Agencies; the Certified Unified Program Agency; the Air Quality Management District; and the local ordinances as cited in the City's Municipal Code. Those requirements include obtaining the proper permits for any construction, demolition, and/or remediation activities.[51]

Transport of ACMs, LCS, or other hazardous materials off-site would be performed by licensed hazardous waste haulers. Disposal would comply with applicable local, state, and federal regulations governing disposal of hazardous materials, including transport by a licensed waste hauler and disposal at a properly certified facility; these regulations are designed to prevent hazardous waste transportation and disposal from causing significant hazards to the public and the environment.

Kettleman Hills Landfill, Buttonwillow, or another Class I landfill in the United States would be utilized for disposal of hazardous waste, based on facility and hazardous material requirements. ACMs are classified as non-hazardous waste and are not federally regulated (i.e., not regulated under the Resource Conservation Recovery Act [non-RCRA-Hazardous waste]); however, only certain facilities accept this type of waste, such as the Azusa Land Reclamation Management Facility. Construction debris contaminated with lead must be tested to determine proper disposal options. Depending on the concentration levels, it may be disposed as

[49] 29 USC, Sections 651 et seq., Occupational Safety and Health Act.

[50] California Labor Code, Section 6300 et seq., California Occupational Safety and Health Act.

[51] City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Planning – Permitting Agencies and the FAA*, October 2017. Available: http://www.lawa.org/uploadedFiles/LAXDev/DCH/2017/Planning/09%20Permitting%20Agencies%20and%20the%20FAA%20October%202017.pdf.

construction debris or may require disposal as a RCRA hazardous waste or non-RCRA hazardous waste.

Compliance with existing federal, state and local regulations and routine precautions would reduce the potential for hazards to the public or the environment through the routine disposal or accidental release of hazardous building materials. Impacts related to hazardous building materials would be less than significant and no further evaluation in the EIR is required.

Soil and Groundwater Contamination

Construction of the proposed project has the potential to result in impacts due to the presence of soil and groundwater contamination beneath the East Maintenance Facility site. The proposed project would not involve any physical alteration to the West Maintenance Facility, therefore, no impacts related to soil or groundwater contamination would occur due to the relocation of activities from this facility to the East Maintenance Facility. Impacts associated with construction activities at the East Maintenance Facility are described below.

As noted in Section 4, *Project Description*, the hangars on the project site were constructed in the mid to late 1940s. Both hangars were historically used for light aircraft maintenance typically involving removal and replacement of aircraft engines, hydraulic fluid replacement, and minor servicing. Other existing and historical site features include outside equipment parking areas; hazardous waste accumulation and chemical storage areas; underground storage tanks (USTs), which historically stored jet fuel, non-chlorinated solvents, thinners, fuel oil, waste oil, and other waste products; a number of above-ground storage tanks (ASTs) used to contain turbo oil, antifreeze, motor oil, waste oil, detergent, propane, blue water, and rinse; jet fuel hydrant system; spray paint booths; active or abandoned clarifiers; a network of floor drains and collection trenches that channel wastewater to the clarifiers; hydraulic lifts; wash racks; and a sanitary disposal triturator (used to grind up sanitary waste from aircraft lavatories prior to disposal into a sanitary sewer). Over the years, many of these features have become inactive and/or closed in place.[52] Waste generated at the project site includes hydraulic fluid, absorbent, waste oil, antifreeze, paint-related material, brake solution, and parts washer fluid.[53]

Historical activities at the project site have resulted in soil and groundwater contamination. Contamination found at the project site includes petroleum hydrocarbons; non-chlorinated volatile organic compounds (VOCs), such as benzene and xylenes; and chlorinated VOCs (CVOCs), including tetrachloroethylene (PCE) and trichloroethylene (TCE). In addition, there is a concern that polyaromatic hydrocarbons (PAHs) may be present due to their association with petroleum hydrocarbons in soil. It is possible that an off-site source is contributory to the

[52] United Airlines, *Human Health Risk Assessment United Airlines Maintenance Operations Center Los Angeles International Airport*, prepared by Environmental Resources Management (ERM), January 2011.

[53] City of Los Angeles, Los Angeles World Airports, *LAX - Phase I Environmental Site Review - United Airlines Maintenance Operations Center (Lease LAA- 7264), 6000 - 6024 Avion Drive, Los Angeles, CA 90045*, Memorandum from Robert D. Freeman, Environmental Services Division, to Julia Mo, Commercial Development Group, December 29, 2010.

contamination found onsite.[54] Ongoing clean-up and monitoring activities are occurring onsite under oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB).

Twelve separate areas have been investigated at the UAL leasehold between 1987 and 2009. The LARWQCB has approved cleanup efforts and/or groundwater monitoring for 11 of these areas. The remaining area, referred to as Area B, is the only area with confirmed impacts to boil soil and groundwater. Area B is located in the eastern portion of the project site (beneath Hangar 2) and is the site of a former waste oil UST. The UST was installed in the 1940s and removed in 1987 under the direction of the Los Angeles Fire Department (LAFD). The UST stored Stoddard solvents and is the source of impacts to soil and groundwater in this area.[55] The presence of the Stoddard solvent free-product and VOC-contaminated groundwater extends about 350 feet east from this source to approximately 25 feet beyond the project site boundary.[56] Cleanup of Area B was initiated in 2004, and includes a free-product removal system. The free-product skimming system had removed approximately 5,400 gallons of the Stoddard solvent through 2016. Current site activities include the continued removal of free-product from the groundwater beneath the project site.[57]

Construction of the proposed project would be coordinated with LAWA and LARWQCB, as required by existing laws and regulations. It is expected that some of the extraction and/or monitoring wells would be out of service during construction. These wells would be capped and flagged during construction to prevent damage to the wells. Following completion of construction, any wells affected during construction would be placed back into service and remediation would be reinstated. It is not anticipated that any wells would be permanently closed or relocated as a result of project-related construction.

If contaminated soils are encountered during construction, testing would be conducted in accordance with existing regulations to determine appropriate abatement options. The soil would be excavated, treated, or disposed of to the satisfaction of the applicable regulatory agencies, which could include the LAFD, LARWQCB, and/or the California Department of Toxic Substances Control (DTSC). As applicable, the construction contractor would be required to comply with SCAQMD Rule 1166 when excavating soil that contains VOCs. As with hazardous building materials, transport of contaminated soils (if encountered and requiring disposal) would be performed by licensed hazardous waste haulers. Disposal would comply with applicable local, state, and federal regulations governing disposal of hazardous materials, including transport by a licensed waste hauler and disposal at a properly certified facility; these regulations are designed

[54] City of Los Angeles, Los Angeles World Airports, *LAX - Phase I Environmental Site Review - United Airlines Maintenance Operations Center (Lease LAA- 7264), 6000 - 6024 Avion Drive, Los Angeles, CA 90045*, Memorandum from Robert D. Freeman, Environmental Services Division, to Julia Mo, Commercial Development Group, April 10. 2013.

[55] Stoddard solvents are petroleum-derived clear liquids used as solvents in painting, also commonly known as "paint thinner".

[56] State of California, California Environmental Protection Agency, Los Angeles Regional Water Quality Control Board, *Los Angeles International Airport, United Airlines Maintenance Operations Center (Area B), FACT SHEET, Groundwater Cleanup*, July 2017.

[57] State of California, California Environmental Protection Agency, Los Angeles Regional Water Quality Control Board, Los Angeles International Airport, *United Airlines Maintenance Operations Center (Area B), FACT SHEET, Groundwater Cleanup*, July 2017.

to prevent hazardous waste transportation and disposal from causing significant hazards to the public and the environment.

Compliance with existing federal, state, and local regulations, as well as routine precautions, would reduce the potential for hazards to the public or the environment through the accidental release of hazardous materials associated with soil and/or groundwater contamination. Impacts related to soil and groundwater contamination would be less than significant and no further evaluation in the EIR is required.

Summary of Impacts

In summary, construction and operation of the proposed project would not 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 from inadvertent releases, hazardous building materials, or soil and groundwater contamination. The potential impact would be less than significant with the implementation of the proposed project and no further evaluation in the EIR is required.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools located or proposed within one-quarter mile of the project site. Therefore, no impacts related to the emitting of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

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?

Less Than Significant Impact. As discussed in Section VIII.b above, the project site has groundwater and soil contamination and is an active cleanup site under regulatory oversight. It is included in lists of hazardous material sites compiled pursuant to Government Code Section 65962.5, and is included in the SWRCB's Geotracker, which is the agency's data management system for sites that impact, or have the potential to impact, water quality in California, with an emphasis on groundwater.[58]

Releases of any hazardous materials are subject to a complex set of regulatory and reporting requirements, including notification to the LAFD and the state Office of Emergency Services (OES). Remediation of contamination is subject to stringent oversight by federal, state, county, and city agencies, depending on the nature of contamination. The LAFD oversees contamination resulting from leaking USTs and other fueling infrastructure. The LARWQCB has the authority over remediation of sites where groundwater quality may be degraded by

[58] The West Maintenance Facility is included in lists of hazardous material sites compiled pursuant to Government Code Section 65962 due to historic activities that have resulted in soil and groundwater contamination at the site. The proposed project would not involve any physical alteration to the West Maintenance Facility, therefore, no impacts related to soil or groundwater contamination would occur due to the relocation of activities from this facility to the East Maintenance Facility.

hazardous materials or substances releases from USTs or other sources, including the proposed project site. These agencies require that remediation continue until regulatory requirements are met and closure is granted. Remediation of contamination has the potential to expose workers to hazardous materials or substances. The SCAQMD regulates emissions from soil remediation activities through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. This rule requires development and approval of a mitigation plan, monitoring of VOC concentrations, and implementation of the mitigation plan if VOC-contaminated soil is detected. Worker safety and health are also regulated by OSHA and CalOSHA, which include standards that establish exposure limits for certain air contaminants. Exposure limits define the maximum amount of hazardous airborne chemicals to which an employee may be exposed over specific periods. When administrative or engineering controls cannot achieve compliance with exposure limits, protective equipment or other protective measures must be used. Employers are also required to provide a written health and safety program, worker training, emergency response training, and medical surveillance.

In addition to these laws and regulations, the technical specifications for construction projects at LAX include provisions relative to the identification, evaluation, management, and treatment/disposal of hazardous waste and other regulated wastes, such as soils impacted by jet fuels and other hydrocarbons.[59]

Compliance with existing regulations governing remediation of contaminated materials, including ongoing LARWQCB oversight, as appropriate, would ensure that implementation of the proposed project on a site with known contamination would not create a significant hazard to the public or the environment. This potential impact would be less than significant and no further evaluation in the EIR is required.

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 for people residing or working in the project area?

No Impact. The project site is located within a public airport. Numerous safeguards are required by law to minimize the potential for, and the effects from, an accident if one were to occur. FAA's Airport Design Standards establish, among other things, land use related guidelines to protect people and property on the ground, including establishment of safety zones that keep areas near runways free of objects that could interfere with aviation activities.[60] Section 12.50 of the Comprehensive Zoning Plan of the City of Los Angeles regulates building height limits and land uses within the Hazard Area established by the Planning and Zoning Code to protect aircraft approaching and departing from LAX from obstacles. In addition to the many safeguards required

[59] City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: LAWA Standards for the Construction Contract*, July 2016. Available: http://www.lawa.org/uploadedFiles/LAXDev/DCH/Construction/LAWA%20Standards%20for%20the%20Construction%20Contract%20-%20Closeout%20Requirements%20July%202016.pdf.

[60] U.S. Department of Transportation, Federal Aviation Administration, *FAA Advisory Circular (AC) 150/5300-13A, Airport Design*, February 26, 2014. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13/.

by law, LAWA and tenants of LAX maintain emergency response and evacuation plans that also serve to minimize the potential for and the effects of an accident.

All proposed project buildings/structures would be designed in accordance with FAA's Airport Design Standards to ensure that the buildings/structures do not interfere with Airport Traffic Control Tower (ATCT) activities or affect airfield safety. Construction activities would be coordinated with FAA through the use of Form FAA 7460-1 (Notice of Proposed Construction or Alteration), which requires that any potential hazards to air navigation be addressed. All construction activities would comply with applicable aviation-related safeguards, and thus would not create a safety hazard. Therefore, there would be no impacts to safety for people working or residing in the project area with the implementation of the proposed project and no further evaluation in the EIR is required.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the project area?

No Impact. The project site is not located within the vicinity of a private airstrip but rather within a public airport. See Section VIII.e above. Therefore, implementation of the proposed project would not result in a safety hazard for people residing or working within the vicinity of a private airstrip. No impact would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. LAWA and tenants of LAX maintain emergency response plans and emergency evacuation plans to minimize the potential for and the effects of an accident, should one occur. Construction activities at the proposed project site and staging area would comply with LAWA and FAA guidelines and procedures that are in place to limit the impacts of construction at the airport, including the potential to affect emergency response. LAWA's Design and Construction Handbook specifies that a Logistic Plan and fully documented Logistical Work Plan Checklist be developed for construction projects. Required information includes, but is not limited to, identification of emergency access provisions, emergency evacuation routes, and 24-hour emergency contact information.[61] Further, LAWA would coordinate with LAFD and Los Angeles World Airports Police Division (LAWA PD) regarding emergency access and other design needs to ensure that emergency service levels are maintained during construction. The LAWA CALM Team would ensure that occupancy and operation of adjacent and surrounding facilities would be maintained throughout demolition and construction activities. In addition, in accordance with standard LAWA practices, all emergency access routes in the vicinity of the project site and staging area would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal, and Los Angeles Fire Code regulations.[62] Therefore, construction of the proposed

[61] City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Construction, Closeout & Safety – LAWA Construction Safety Program Requirements*, July 2016. Available: http://www.lawa.org/uploadedFiles/LAXDev/DCH/Construction/LAWA%20Construction%20Safety%20Program%20Requirements%20Rev%204.pdf.

[62] U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular (AC) 150/5300-13A - Airport Design*, February 26, 2014. Available:

project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. In addition, LAWA would submit Form FAA 7460-1 (Notice of Proposed Construction or Alteration) to FAA in advance of construction as required by 14 CFR §77.9, to ensure that the proposed project would not represent an obstruction to airport operations.

With regards to operations, the proposed facility would operate in a similar manner as it currently does at the East Maintenance Facility. Operation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plans. Therefore, implementation of the proposed project would have no impact related to emergency response plans or emergency evacuation plans and no further evaluation in the EIR is required.

h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project site is located within a developed airport and surrounded by airport uses, urbanized areas, and the Los Angeles/El Segundo Dunes. There are no fire hazard areas containing flammable brush or grass on the 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.[63] Therefore, implementation of the proposed project would not result in the exposure of people or structures to hazards associated with wildland fires and no further evaluation in the EIR is required.

IX. HYDROLOGY AND WATER QUALITY. *Would the project:*

a. Violate any water quality standards or waste discharge requirements?

No Impact. The agency with jurisdiction over water quality within the project area is the LARWQCB. The Clean Water Act (CWA) prohibits the discharge of pollutants to waters of the United States from any point source unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In accordance with the CWA, the project site is within the region covered by NPDES Permit No. CAS004001 issued by the LARWQCB. As part of the storm water program associated with the NPDES Phase 1 Permit, LARWQCB adopted the Standard Urban Storm Water Mitigation Plan (SUSMP) to address storm water pollution from new development and redevelopment projects. A change to the permit puts primary emphasis on Low Impact Development (LID) practices over treatment control BMPs. The Stormwater LID Ordinance approved by the City of Los Angeles outlines requirements for providing LID strategies for new development and redevelopment projects.[64]

http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13; U.S. Department of Transportation, Federal Aviation Administration, Federal Aviation Regulations (FAR) Sections 139.315-139.319 — *Air Rescue and Firefighting (ARFF)*; 24 California Code of Regulations, Part 9 – *California Fire Code*, Chapter 9 (Fire Protection Systems) and Chapter 10 (Means and Egress); and Los Angeles Municipal Code, Chapter V, Article 7 – *Fire Protection and Prevention (Fire Code)*.

[63] City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit D, Selected Wildfire Hazard Areas In the City of Los Angeles, April 1996.

[64] City of Los Angeles, *Ordinance No. 181,899, Low Impact Development (LID) Strategies*, October 7, 2011.

Implementation of the proposed project would not result in a material increase in impervious surfaces at the project site, as the site is currently developed and predominantly paved, with the only exception being two small pockets of ornamental landscaping. However, construction would result in site disturbance associated with site excavation and grading and pavement removal. These construction activities would require preparation of a SWPPP to address construction-related surface water quality impacts and delineate water quality control measures (i.e., BMPs) and/or LID practices to address those impacts. Temporary construction BMPs specified in LAWA's existing Construction SWPPP for LAX include, but are not limited to, the following: soil stabilization (erosion control) techniques; sediment control methods; contractor training programs; material transfer practices; waste management practices; roadway cleaning/tracking control practices; vehicle and equipment practices; and fueling practices.

As noted above, construction of the proposed project would occur on a site that is currently developed and almost entirely paved, with the only exception being two small pockets of ornamental landscaping. The proposed project and associated facilities would not materially alter existing drainage patterns or surface water runoff quantities on the project site and would not violate any water quality standards or waste discharge requirements. Therefore, no impact related to water quality would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?

No Impact. The project site is located within the West Coast Groundwater Basin. Groundwater beneath the project site is not used for municipal or agricultural purposes. As described under Section VI.a.iii above, the groundwater beneath the site is approximately 90 feet below ground surface. Given the depth of groundwater, construction of the proposed project is not expected to involve dewatering and, thus, would not deplete groundwater supplies. Moreover, operation of the proposed project would not rely on groundwater supplies nor would the proposed project result in a material increase in the amount of impervious surface on the project site. Therefore, no impacts to groundwater supplies or groundwater recharge would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Available: http://www.lastormwater.org/wp-content/files_mf/finallidordinance181899.pdf.

c-d. No Impact. As noted in Section IX.a above, the proposed project would be constructed on a site that is currently impervious, with the only exception being two small pockets of ornamental landscaping. Implementation of the proposed project would not alter drainage patterns in a manner that would result in erosion or siltation offsite or increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite. Therefore, no impacts to water quality related to existing drainage patterns would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

e. 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?

Less Than Significant Impact. As noted in Section IX.c-d above, the proposed project would be constructed on a site that is currently impervious, with the only exception being two small pockets of ornamental landscaping. Implementation of the proposed project would not alter drainage patterns or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems and no further evaluation in the EIR is required.

As discussed in Section IX.a above, construction of the proposed project would result in site disturbance associated with site excavation and grading and pavement removal. These construction activities would require preparation of a SWPPP to address construction-related surface water *quality* impacts and delineate water quality control measures (i.e., BMPs) and/or LID practices to address those impacts. Temporary construction BMPs specified in LAWA's existing Construction SWPPP for LAX include, but are not limited to, the following: soil stabilization (erosion control) techniques; sediment control methods; contractor training programs; material transfer practices; waste management practices; roadway cleaning/tracking control practices; vehicle and equipment practices; and fueling practices.

As discussed in Section VIII.a above, operation of the proposed project would involve some use of hazardous materials, including vehicle fuels, oils, transmission fluids, and cleaning solvents, similar to those currently found at the existing aircraft maintenance and GSE facilities. These types of materials are not acutely hazardous, and storage, handling, and disposal of these materials are strictly regulated. Compliance with existing federal, state, and local regulations, as well as routine precautions, would reduce the potential for accidental releases of a hazardous material to occur and would minimize the impact of an accident should one occur. Therefore, the proposed project would not result in substantial additional sources of polluted runoff and its impact would be less than significant; no further evaluation in the EIR is required.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed in Section 4, *Project Description*, the proposed project includes the removal and replacement of an existing triturator at the East Maintenance Facility with a new, more-efficient triturator, reducing the potential for an unauthorized leak of the triturator components that could affect groundwater. Further, the proposed project would comply with all applicable local, state, and federal regulations during transfer of sewage from aircraft to the triturator system and during operation of the triturator to avoid a potential unauthorized release of sewage into the storm drain system. Therefore, the proposed project's

potential to substantially degrade water quality would be less than significant and no further evaluation in the EIR is required.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

g-h. No Impact. No 100-year flood hazard areas are located within LAX.[65,66] Further, the proposed project does not involve the construction of housing. Therefore, no impacts resulting from the placement of housing or other structures within a 100-year flood hazard area would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. Please see Sections IX.g-h above regarding flooding. In addition, as delineated on the City of Los Angeles Inundation and Tsunami Hazard Areas map, the project site is not within a boundary of an inundation area from a flood control basin, nor is it located within the downstream influence of any levee or dam.[67] Therefore, no impacts due to the exposure of people or structures to a risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam would occur with the implementation of the proposed project, and no further evaluation in the EIR is required.

j. Inundation by seiche, tsunami, or mudflow?

No Impact. The project site is approximately 3 miles east of the Pacific Ocean and is not delineated as a potential inundation or tsunami impacted area in the City of Los Angeles Inundation and Tsunami Hazard Areas map.[68] Mudflows are not a risk as the project site is located on, and is surrounded by, relatively level terrain and urban development. Therefore, no impacts resulting from inundation by seiche, tsunami, or mudflow would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

X. LAND USE AND PLANNING. *Would the project:*

a. Physically divide an established community?

No Impact. The project site is located entirely within the boundaries of a developed airport in an urbanized area and development of the project site within the airport would not

[65] City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, March 1994.

[66] U.S. Department of Homeland Security, Federal Emergency Management Agency, *Letter of Map Revision Based on Fill 218-65-R, Map Panel Affected: 0601370089 D*, September 6, 2002.

[67] 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.

[68] 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.

disrupt or divide the physical arrangement of an established community. Therefore, no impacts resulting from physically dividing an established community would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The existing zoning for the site is LAX Zone. Land use designations and development regulations applicable to LAX are set forth in the LAX Plan and LAX Specific Plan, both approved by the Los Angeles City Council in December 2004 and subsequently amended.[69,70] The project site is in an area designated in the LAX Plan as "Airport Airside." Within the LAX Specific Plan, the site is in an area designated as within the Airport Airside Subarea and zoned LAX Zone: Airport Airside Subarea. Section 9.B of the LAX Specific Plan delineates the permitted uses within the Airport Airside Subarea. Of the numerous uses listed, the following permitted uses are located in the proposed project area and/or are applicable to the proposed project:

- Surface and structured parking lots (including those at-grade, above-grade, and subterranean)
- Aircraft under power
- Airline maintenance and support, including, but not limited to, storage, aircraft engine or airframe repair and testing, and aircraft maintenance shops
- Air cargo facilities
- Runways, taxiways, aircraft parking aprons, and service roads
- Cargo staging area
- Uses customarily incident to any of the above uses, and accessory buildings or uses

The proposed project would consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility—the project site), and provide new and improved facilities, including a new aircraft maintenance and GSE facility, and an associated blast fence, at that location. The proposed project components would be consistent with the LAX Plan land use designation and with the allowable uses under the LAX Specific Plan, which are presented above. Therefore, the proposed project would not conflict with the applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Moreover, implementation of the proposed project would be consistent with the LAX Specific Plan

[69] City of Los Angeles, Department of City Planning, *LAX Plan*, adopted December 14, 2004, last amended June 7, 2017.

[70] City of Los Angeles, Department of City Planning, *Los Angeles International Airport (LAX) Specific Plan*, adopted December 14, 2004, last amended September 8, 2017. Available: http://www.lawa.org/uploadedFiles/OurLAX/pdf/17-0276-s2_ORD_185164_10-28-17.pdf.

permitted uses. No conflict with an applicable land use plan, policy, or regulation would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The Dunes Specific Plan Area, a designated Los Angeles County Significant Ecological Area, is located approximately 2.5 miles to the west of the project site, opposite Pershing Drive. The proposed project would be located within an urbanized airport area within and adjacent to existing airport uses and would not affect the Dunes Specific Plan Area. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan or other natural community conservation plan that includes the project site or construction staging area. Therefore, no impacts to, or conflict with, any habitat or natural community conservation plans would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

XI. MINERAL RESOURCES. *Would the project:*

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?

No Impact. The project site is within the boundaries of the airport and surrounded by airport-related uses. There are no mineral resources on the project site, nor is the site available for mineral resource extraction given the existing airport use.[71] Therefore, no impacts related to the loss of availability of a known, valued mineral resources would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

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?

No Impact. The project site is not within an area delineated on the City of Los Angeles Mineral Resources map in the City of Los Angeles General Plan Conservation Element or the City of Los Angeles Oil Field & Oil Drilling Areas map in the City of Los Angeles General Plan Safety Element.[72,73] Furthermore, the project site is disturbed and in an area that is not available for mineral resource extraction due to the existing airport use. Therefore, no impacts related to the availability of a locally-important mineral resource recovery site would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

[71] City of Los Angeles, Department of City Planning, *Conservation Element of the City of Los Angeles General Plan*, Exhibit A, Mineral Resources, January 2001.

[72] City of Los Angeles, Department of City Planning, *Conservation Element of the City of Los Angeles General Plan*, Exhibit A, Mineral Resources, January 2001.

[73] City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit E, Oil Field & Oil Drilling Areas in the City of Los Angeles, May 1994.

XII. NOISE. *Would the project result in:*

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

a-d. Less Than Significant Impact. The proposed project would consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility), and provide new and improved facilities at that location. The project site is within a public airport in an urban environment that operates 24 hours a day, seven days a week, and 365 days a year, with many existing sources of noise, including aviation noise and traffic noise.

In general, humans find a change in sound level of 3 dB is just noticeable. Because of the logarithmic scale of the decibel unit, sound levels cannot be added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dB, regardless of the initial sound level. For example, 60 dB plus 60 dB equals 63 dB, 80 dB plus 80 dB equals 83 dB. However, where ambient noise levels are high in comparison to a new noise source, there will be a small change in noise levels. For example, 70 dB ambient noise levels are combined with a 60 dB noise source the resulting noise level equals 70.4 dB.

Construction Noise

Construction Equipment Noise

In accordance with the L.A. CEQA Thresholds Guide, construction activities are considered to have a significant impact relative to construction noise if construction activities lasting more than ten days in a three-month period would exceed baseline ambient exterior noise levels by 5 dBA or more at a noise-sensitive use.[74]

Construction of the proposed project, which would involve the use of various pieces of equipment, would result in a temporary increase in ambient noise levels immediately adjacent to the project site. 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 noise levels from equipment with mufflers are typically 86 A-weighted decibels (dBA) in equivalent A-weighted sound level (L_{eq}) at 50 feet from the noise source.[75] This type of sound typically dissipates at a rate of 4.5 dBA to 6.0 dBA for each doubling

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

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

of distance.[76] For the noise analysis of the proposed project, the more conservative attenuation rate of 4.5 dBA was used. As such, 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 residential land use is residential development approximately 3,600 feet to the northwest in the Manchester Square area. The nearest non-residential noise-sensitive land use is the Crowne Plaza Hotel located approximately 450 feet to the north. Based on a noise attenuation rate of 4.5 dBA per doubling of distance (not including noise attenuation associated with intervening walls, structures, and topography which can result in up to approximately 10 to 20 dBA reduction, depending on the nature and height of the intervening barrier between noise source and receptor), the noise levels from construction activities within the project site would be approximately 58.1 dBA L_{eq} at the closest residences in Manchester Square and 71.7 dBA L_{eq} at the nearest edge of the Crowne Plaza Hotel. The existing daytime ambient noise level at the nearest residential receptor (i.e., residential development in Manchester Square) is approximately 61.3 dBA L_{eq} or higher, with the nighttime ambient noise level being approximately 5 dBA lower, and the existing daytime ambient noise level at the nearest non-residential noise-sensitive receptor (i.e., Crowne Plaza Hotel north of Century Boulevard) is approximately 72 dBA L_{eq}, with the nighttime ambient noise level being approximately 5 dBA lower.[77]

As noted above, construction activities are considered to have a significant impact relative to construction noise if construction activities lasting more than ten days in a three-month period would exceed baseline ambient exterior noise levels by 5 dBA or more at a noise-sensitive use.[78] The noise level from construction activity within the project site (58.1 dBA L_{eq} at residential development in Manchester Square and 71.7 dBA L_{eq} at the Crowne Plaza Hotel, not accounting for any intervening buildings or other noise barriers) would not exceed the existing daytime or nighttime ambient noise level by 5 dBA or more at the nearest residential or non-residential noise-sensitive use. Daytime construction noise levels would be lower than existing ambient daytime noise levels at both the nearest residential and non-residential noise-sensitive uses; nighttime construction noise levels would be less than 5 dB over existing ambient nighttime noise

[76] U.S. Department of Transportation, Federal Highway Administration, *Highway Traffic Noise: Analysis and Abatement Guidance*, *FHWA-HEP-10-025*, December 2011. Available: https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf.

[77] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, *(SCH 2015021014)*, Appendix M, Road Traffic Noise, Table M-2, Project Area Noise Measurements, September 2016. Available: http://www.connectinglax.com/files/LAMP_DEIR_Appendix%20M.pdf. In Table M-2 of Appendix M, the ambient noise level measurement at 6101 W. Century Boulevard (RP2) is the closest to, and most representative of, existing noise levels at the Crown Plaza Hotel, and the ambient noise level measurement at 5450 W. 99th Place (RP10) is the closest to, and most representative of, existing noise levels at the closest remaining residential land use in Manchester Square).

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

levels at both of these receptors. Therefore, noise from construction equipment 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. Moreover, construction equipment associated with the proposed project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Potential impacts associated with construction equipment noise would therefore be less than significant and no further evaluation in the EIR is required.

Construction Roadway Noise

With regard to roadway noise associated with construction traffic on area roads, traffic volumes on roads with good operating conditions (i.e., Level of Service B or better) would have to increase at more than a three-fold rate to reach the City's threshold of significance of a 5 dBA increase, and would need to increase even more on roads with poor operating conditions (i.e., Level of Service C or worse).[79] Roadways in the project area are heavily traveled. Existing traffic volumes on Century Boulevard east of Avion Drive were approximately 2,875 trips in the AM peak hour, and 2,685 trips in the PM peak hour in 2015.[80]

As stated in Section 4, *Project Description,* the peak daily number of construction employees traveling to and from the project site would be approximately 165. In addition, the estimated maximum number of hourly truck trips would be approximately 18. For the purpose of evaluating traffic impacts, truck trips can be converted to "passenger car equivalents" (PCEs) to account for the additional impact that large vehicles would have on roadway traffic operations. If a PCE factor of 2.5 was applied to the truck trips, which is consistent with the assumptions in previous LAX construction projects, the number of peak hourly truck trips would equate to approximately 45 PCEs. The combination of the peak daily number of construction worker trips and the number of peak hourly truck trips would be approximately 210 vehicle trips, including construction worker commute trips and construction truck trips as adjusted with the PCE factor.[81]

[79] Increases in sound pressure levels (i.e., noise) increase logarithmically. The sound pressure level from two equal sources is 3 dB greater than the sound pressure level of just one source (Source: U.S. Department of Transportation, Federal Highway Administration, *Highway Traffic Noise Homepage: Highway Traffic Noise Analysis and Abatement Policy and Guidance*, updated August 24, 2017. Available: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed November 21, 2017). This would also be true relative to a doubling of traffic volumes, expressed logarithmically as $10 \text{ Log} \frac{2}{1}$ = 3 dB. As such, a tripling of traffic volumes would equate to $10 \text{ Log} \frac{3}{1}$ = 4.77 dB.

[80] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix O, Off-Airport Traffic Study, Figure 10C, Existing (2015) Conditions – AM(PM) Peak Hour Traffic Volumes, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20O_report.pdf. In Figure 10C, Intersection 78 (Avion Drive and Century Boulevard) is the closest to, and most representative of, existing traffic volumes near the project site.

[81] This number overstates the construction-related contribution to roadway noise, because it does not account for different shift times of construction workers or carpooling, and it assumes that all construction workers and all estimated maximum hourly trucks would be on the roadway segment at the same time.

These project-related construction trips would not approach the number of trips required to result in a three-fold increase on any area roads. Therefore, construction-related trips 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. Moreover, construction-related roadway noise associated with the proposed project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Impacts associated with construction roadway noise would be less than significant and no further evaluation in the EIR is required.

Construction Equipment Vibration

Major construction within 200 feet and pile driving within 600 feet may result in potentially disruptive vibration to sensitive receptors.[82] Vibration-sensitive receptors are similar to noise-sensitive receptors and include residences, schools, hospitals, libraries, recreational areas, fragile or historic buildings, and buildings such as computer chip manufacturers, radio and TV stations, and recording studios. As noted above, the project site is located in a busy international airport. Facilities in the general vicinity of the project site include air cargo buildings, aircraft maintenance buildings, a commuter terminal, and a parking structure, none of which are a vibration-sensitive use. The nearest vibration-sensitive structure is the Quonset Hut, which is an historic building located within the western portion of the project site.

Bulldozers, vibratory rollers, loaded trucks, and jackhammers are examples of the types of equipment that could be used during project construction and result in vibration impacts to nearby uses. Vibration levels are estimated using peak particle velocity (ppv), which is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second (in/sec). Vibration levels for the types of equipment noted above were estimated using peak ppv levels in in/sec published by Caltrans.[83] The threshold of significance relative to the potential for vibration-related structural damage to occur at an historic building is considered to be 0.5 ppv in/sec.[84]

Table 2 summarizes the estimated vibration levels of various types of construction equipment at a distance of 15 feet, which represents the closest distance between the project site and the Quonset Hut that would be less than the threshold of significance for all the types of equipment listed.

[82] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, September 2013. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

[83] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual,* Table 14, September 2013. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

[84] California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, Table 14, September 2013. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

Table 2 Vibration Levels During Construction

Equipment	ppv at 15 feet (in/sec)
Vibratory roller	0.452
Large bulldozer	0.191
Loaded trucks	0.164
Jackhammer	0.075
Small bulldozer	0.006
Notes: ppv = peak particle velocity in/sec = inch(es) per second Source: CDM Smith, 2017.	

As indicated in Table 2, the highest construction-related vibration level at a distance of 15 feet would be 0.452 ppv in/sec, which is below the threshold of significance of 0.5 ppv in/sec. Based on the analysis above, the proposed project would not expose persons to, or generate, excessive groundborne vibration; therefore, impacts associated with groundborne vibration or groundborne noise would be less than significant and no further evaluation in the EIR is required.

Operational Noise

Aircraft Noise

As indicated previously, implementation of the proposed project would not result in an increase in activity within LAX, or an increase in aircraft operations. Moreover, operation of the proposed project would not increase the number of daily flights arriving and departing from LAX or the ambient growth in aviation activity at LAX that is projected to occur in the future. The project site is generally removed from most noise-sensitive uses and the nature of the proposed activities, which are similar to other such activities occurring throughout the airport, would not change.

The one aspect of the proposed project that may result in a change in existing operational noise levels pertains to the conducting of aircraft engine "ground run-ups." As part of regularly scheduled maintenance, FAA requires that aircraft engines be tested at various power levels while the aircraft is out of service and on the ground in a stationary position to ensure the engines' proper operation prior to the aircraft being returned to service. These aircraft engine "ground run-ups" are regularly performed at LAX for maintenance checks and are of two general types: low-power and high-power. High-power engine checks typically involve engine run-ups at or near maximum thrust settings, and normally require the use of safety devices referred to as jet blast deflectors (JBDs) or "blast fences," which are typically curved, one-sided structures that redirect high energy exhaust (jet blast) from jet engines in order to protect areas behind the run-up area from jet blast. Such engine ground run-ups are presently conducted at the United Airline West Maintenance Facility, which has 6 blast fences, but not at the East Maintenance Facility, which currently has no blast fences.

The proposed project includes installation of a jet blast deflector at the East Maintenance Facility to allow engine ground run-ups when required for certain engine maintenance activities

at the new facility (see Figure 6). This run-up area would be able to accommodate engine run-ups approximately 90 percent of the time.[85] Run-ups during non-standard wind conditions would occur at another location at LAX. It is expected that between two and four high-power engine run-ups would be conducted on site each week, on average. Engine run-ups would be conducted between 6:00 am and 11:00 pm, in accordance with LAWA policies.

The relocation of aircraft engine ground run-ups from the West Maintenance Facility to the East Maintenance Facility would place such activity farther away from noise-sensitive residential uses. The distance from existing run-up activity in the West Maintenance Facility to the nearest residential uses in El Segundo to the south is approximately 2,600 feet. The distance from the run-up area proposed in the East Maintenance Facility to the nearest, unobstructed residential uses, which are also located in El Segundo, is approximately 5,900 feet.

The relocation of aircraft engine ground run-ups from the West Maintenance Facility to the East Maintenance Facility would increase the related noise levels at non-residential noise-sensitive uses located north of the project site, the nearest being the Crowne Plaza Hotel. The Crowne Plaza Hotel is located approximately 1,400 feet from the location of the proposed ground run-up area. The proposed hangar and the existing UAL cargo building would lie between the run-up area and the hotel.

In a ground run-up enclosure study completed by LAWA in December 2014, the noise levels associated with all of the United Airlines aircraft engine ground run-up activity at the West Maintenance Facility were estimated and plotted using a grid-based layout; specifically, the estimated Community Noise Equivalent Level (CNEL) was calculated every 750 feet and broken down in 5 dB increments from less than 55 dB to greater than 80 dB.[86] The study showed that noise levels at a grid point located 750 from the ground run-up area, and separated from the run-up area by an intervening structure, would be between 68 and 70 dB CNEL. For purposes of this analysis, it is estimated that noise from aircraft engine ground run-ups at the Crowne Plaza Hotel would be similar to noise at this grid point (i.e., less than or equal to 70 dB CNEL), even under a very conservative worst-case assumption that all of the existing ground run-up activities at the West Maintenance Facility were to shift over to the East Maintenance Facility. The existing CNEL at the Crowne Plaza Hotel is approximately 77.4.[87] With the addition of a run-up noise level of 70 dB CNEL, the combined noise level at the Crowne Plaza Hotel would be 78.1 dB CNEL. A

[85] Aircraft engine ground run-ups normally require that the aircraft be positioned facing into the wind. At LAX, the predominant wind direction is from west to east (approximately 90 percent of the time), and the proposed blast fence would be positioned to accommodate aircraft engine run-ups in these wind conditions. When UAL aircraft engine ground run-ups are required during conditions where the wind direction is not from west to east, the run-ups would occur at another blast fence located at LAX available for the non-standard wind conditions.

[86] City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport (LAX) Ground Run-up Enclosure (GRE) Siting Study*, February 18, 2015. Figure 5-2, CNEL for No-GRE Scenario (Existing Conditions) Run-Up Noise Only.

[87] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, Appendix M, Road Traffic Noise, Table M-2, Project Area Noise Measurements, September 2016. Available: http://www.connectinglax.com/files/LAMP_DEIR_Appendix%20M.pdf. In Table M-2, the ambient noise level measurement at 6101 W. Century Boulevard is the closest to, and most representative of, existing noise levels at the Crown Plaza Hotel.

significant impact related to operational noise is considered to occur if a project causes the ambient noise level to increase by 3 dBA CNEL. With the addition of ground run-up activities at the proposed project site, the increase in CNEL would be 0.7 dBA, considerably lower than 3 dBA CNEL. Therefore, impacts associated with operational aircraft noise would be less than significant and no further evaluation in the EIR is required.

Operational Roadway Noise

With regard to roadway noise associated with operational traffic on area roads, traffic volumes on roads with good operating conditions (i.e., Level of Service B or better) would have to increase at more than a three-fold rate to reach the City's threshold of significance of a 5 dBA increase, and would need to increase even more on roads with poor operating conditions (i.e., Level of Service C or worse).[88] Roadways in the project area are heavily traveled. Existing traffic volumes on Century Boulevard east of Avion Drive were approximately 2,875 trips in the AM peak hour, and 2,685 trips in the PM peak hour in 2015.[89] Currently, approximately 220 employees work at the East Maintenance Facility across all shifts, and approximately 290 employees work at the West Maintenance Facility across all shifts. With implementation of the proposed project, the West Maintenance Facility employees would move to the East Maintenance Facility. The addition of up to 290 vehicle trips on Century Boulevard would not result in a three-fold increase on Century Boulevard or other roadways in the project area. (Note that these employees are spread across multiple shifts; therefore, the number of employee vehicles on the roadway system at any one time would be substantially lower than 290.)

These project-related operational trips would not approach the number of trips required to result in a three-fold increase on any area roads. Therefore, operational trips 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. Moreover, operational roadway noise associated with the proposed project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Impacts associated with operational roadway noise would be less than significant and no further evaluation in the EIR is required.

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[88] Increases in sound pressure levels (i.e., noise) increase logarithmically. The sound pressure level from two equal sources is 3 dB greater than the sound pressure level of just one source (Source: U.S. Department of Transportation, Federal Highway Administration, *Highway Traffic Noise Homepage: Highway Traffic Noise Analysis and Abatement Policy and Guidance*, updated August 24, 2017. Available: https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed November 21, 2017). This would also be true relative to a doubling of traffic volumes, expressed logarithmically as $10 \text{ Log} \frac{2}{1}$ = 3 dB. As such, a tripling of traffic volumes would equate to $10 \text{ Log} \frac{3}{1}$ = 4.77 dB.

[89] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix O, Off-Airport Traffic Study, Figure 10C, Existing (2015) Conditions – AM(PM) Peak Hour Traffic Volumes, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20O_report.pdf. In Figure 10C, Intersection 78 (Avion Drive and Century Boulevard) is the closest to, and most representative of, existing traffic volumes near the project site.

Summary of Impacts

Construction and operation of the proposed project would not expose persons to, or result in the generation of, noise in levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies; expose people to, or result in the generation of, excessive groundborne vibration or groundborne noise levels; create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore, impacts related to construction and operational noise would be less than significant and no further evaluation in the EIR is required.

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 expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. Implementation of the proposed project involves the relocation and consolidation of aircraft maintenance activities from the West Maintenance Facility on the west side of LAX over to the East Maintenance Facility on the east side of LAX. As described above, there would be a temporary increase in ambient noise levels during construction of the proposed project; however, the potential impacts associated with that increase would be less than significant. As also discussed above, the proposed project would not result in significant noise impacts related to operational noise in areas near the airport. Based on the assessment above, implementation of the proposed project would not expose people residing or working in the project area to excessive noise from a project located within an airport land use plan and no further evaluation in the EIR is required.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is within a public airport and not located within the vicinity of a private airstrip. Therefore, no impact would occur relative to the exposure of people residing or working in the project area to excessive noise levels from a private airstrip with the implementation of the proposed project and no further evaluation in the EIR is required.

XIII. POPULATION AND HOUSING. *Would the project:*

a. Induce substantial 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)?

No Impact. The employees that would work at the improved East Maintenance Facility would be employees that already work at the subject facility, along with existing employees moved from the West Maintenance Facility. The project site is located within a developed airport; no new roads or extensions of existing roads serving new development, or other growth-accommodating infrastructure, are proposed. Therefore, the implementation of the proposed project would not directly or indirectly induce substantial population growth directly or indirectly and no further evaluation in the EIR is required.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

b-c. No Impact. There are no existing residential properties on the project site. Implementation of the proposed project would not displace housing. Therefore, no impacts on housing would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

XIV. PUBLIC SERVICES. *Would the project 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 public services?*

a. Fire protection?

No Impact. The LAFD provides fire protection services to the project site. Four LAFD fire stations are located on airport property (Fire Station Nos. 51, 95, 5, and 80). Fire Station No. 95, located at 10010 International Road, is approximately 0.35 mile east of the project site; Fire Station No. 51, located at 10435 South Sepulveda Boulevard, is approximately 0.4 mile west of the project site; Fire Station No. 5, located at 8900 Emerson Avenue, is approximately 1.2 miles northwest of the project site; and, Fire Station No. 80/ARFF, located at 7250 World Way West, is approximately 1.7 miles west of the project site. The project site is currently developed and used for airport uses. The proposed project would comply with all applicable City, state, and federal codes and ordinances, including LAFD and Los Angeles Building and Safety requirements.[90] Implementation of the proposed project would not result in an increase in demand for fire protection services leading to the need for new or altered fire protection facilities, the construction of which could lead to a substantial adverse physical impact. Therefore, no impacts to fire protection services with the implementation of the proposed project would occur and no further evaluation in the EIR is required.

b. Police protection?

No Impact. Both the Los Angeles World Airports Police Division (LAWA PD) and the City of Los Angeles Police Department LAX Detail (LAPD LAX Detail) provide police protection services to the project site. The LAWA PD station is located north of Park One, approximately 0.6 mile northwest of the project site, and the LAPD LAX Detail station is located within the CTA, approximately 0.5 mile west of the project site. Demand for on-airport police protection services

[90] Including, but not limited to: U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular (AC) 150/5300-13A – Airport Design*, February 26, 2014. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13; U.S. Department of Transportation, Federal Aviation Administration, Federal Aviation Regulations (FAR) Sections 139.315-139.319, *Air Rescue and Firefighting (ARFF)*; 24 California Code of Regulations, Part 9 – *California Fire Code*, Chapter 9 (Fire Protection Systems) and Chapter 10 (Means and Egress); and Los Angeles Municipal Code, Chapter V, Article 7 – *Fire Protection and Prevention (Fire Code)*.

is typically determined by increases in passenger activity and employees. The main purpose of the proposed project is to consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility), and provide new and improved facilities at that location. The proposed project would not increase passenger capacity or long-term employment at LAX that would result in need for additional police protection. Therefore, the proposed project would not result in impacts to police protection that would require the construction of new facilities or the expansion of existing facilities. No impact would occur on police services and no further evaluation in the EIR is required.

c. Schools?

No Impact. The proposed project would consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility), and provide new and improved facilities at that location. The proposed project would not include residential development and would not increase passenger capacity or long-term employment at LAX such that indirect growth would result in enrollment increases that would adversely impact schools. Therefore, no impacts to existing school facilities or need for new school facilities would result from the implementation of the proposed project and no further evaluation in the EIR is required.

d. Parks?

No Impact. The proposed project would consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility), and provide new and improved facilities at that location. The proposed project would not include residential development and would not increase passenger capacity or long-term employment such that indirect growth would result in increased demand for neighborhood or regional parks. Therefore, no impacts to existing parks or need for new parks would result from implementation of the proposed project and no further evaluation in the EIR is required.

e. Other public facilities?

No Impact. The proposed project would consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility), and provide new and improved facilities at that location. The proposed project does not include residential development, and thus would not contribute to a direct increase in demand for other public facilities (e.g., libraries). Moreover, the proposed project would not result in increases in passenger capacity at the airport or result in an increase in airport employment. Therefore, the proposed project would not induce substantial population growth in the area or indirectly result in a demand for other public facilities. Therefore, no impacts to, or need for, new public facilities would occur from implementation of the proposed project and no further evaluation in the EIR is required.

XV. RECREATION.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

a-b. No Impact. The proposed project does not include development of recreational facilities nor does it include residential development. The proposed project would not increase passenger capacity or long-term employment at LAX such that increased demand for neighborhood and regional parks or other recreational facilities would occur. Therefore, the proposed project would not result in substantial physical deterioration of existing area recreational facilities or require the construction or expansion of recreational facilities. As such, no impacts related to recreational facilities would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

XVI. TRANSPORTATION/TRAFFIC. *Would the project:*

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

a-b. Potentially Significant Impact.

Construction Traffic Impacts

Construction of the proposed project would be phased over approximately 22 months (one year and ten months), beginning with the demolition of existing facilities in the East Maintenance Facility lease area. Prior to demolition, the majority of the existing functions in the East Maintenance Facility would be relocated to the West Maintenance Facility on an interim basis during construction. Some aircraft maintenance would continue to be conducted on the eastside ramp area during construction. Employees of the East Maintenance Facility who currently park at Parking Lot H would park in Parking Garage F during and after construction. East facility employees who would be relocated to the West Maintenance Facility during construction would continue to park on the east side of the airport during construction (in Parking Garage F) and would be bused on the airfield side (i.e., on non-public roadways) to and from the West Maintenance Facility.

Demolition of the existing East Maintenance Facility is projected to commence in the fourth quarter of 2018 and new construction would extend to August 2020. All construction staging would occur onsite. Construction worker parking is anticipated to occur at Parking Garage F, which is located north of the current East Maintenance Facility on the south side of Century Boulevard at Avion Drive.

Trucks leaving the project site would travel north on Avion Drive, east on Century Boulevard, and either north on Aviation Boulevard to Manchester Boulevard, or south on Aviation Boulevard, connecting to I-105, La Cienega Boulevard, or I-405. The haul route for the proposed project is shown on Figure 9. All demolition and construction activities would occur on the landside and no entry to the AOA would be required. No lane or road closures of public roadways would be required for construction.

As described above, the proposed project would generate temporary construction-related traffic that would utilize both on-airport and off-airport roadways. The EIR will evaluate whether construction of the proposed project would: (1) conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; and/or (2) conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

Operational Traffic Impacts

Relative to operational traffic, the vehicle trips to and from the project site would primarily be associated with employee trips and delivery vehicles. Employee trips are generally associated with work shifts, while delivery vehicles would access the site throughout the day. Overall the number of vehicle trips is not expected to change as a result of the proposed project. However, the proposed project would consolidate aircraft and GSE maintenance, storage, and office functions from two existing locations into a single location. The consolidation would alter off-airport vehicular movements. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility, including Imperial Highway, Pershing Drive, and Westchester Parkway, would instead drive to the East Maintenance Facility, which would be accessed via Century Boulevard.

In addition to these project-related changes, shared-ride vans that currently park on the project site (between Parking Garage F and Parking Lot H) are currently planned to be relocated to a parking area located on the north side of W. 111th Street, referred to Lot E, that is located immediately east of the Proud Bird Food Bazaar and Events Center. This relocation is planned for Spring 2018 as part of ongoing operational changes at LAX. This relocation will occur independently of the proposed project.

The EIR will evaluate operational vehicle traffic and whether the proposed project would result in a significant change in peak vehicle traffic hour characteristics at LAX that would not otherwise occur if the project is not implemented. Specifically, the EIR will evaluate whether operation of the proposed project would: (1) conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; and/or (2) conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. The analysis will consider both changes in employee trips and changes in shared-ride van due to the relocation of the holding lot.

In summary, the EIR will evaluate the potential effects on the circulation system associated with construction traffic and the redistribution of vehicles associated with operations.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?

No Impact. The proposed project would consolidate existing aircraft and GSE maintenance activities from two locations into one of those locations (East Maintenance Facility), and provide new and improved facilities at that location. Implementation of the proposed project would not increase airport capacity or affect the routing of aircraft in the air to and from LAX. No change in air traffic patterns would occur and no change in safety risks would result. Therefore, no impact would occur and no further evaluation in the EIR is required.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. Implementation of the proposed project involves improvements to the East Maintenance Facility, which is on the AOA (i.e., non-public area). The project does not include any design features, such as sharp curves or dangerous intersections, that would increase hazards. Construction equipment would operate within the limits of the project site, with barricades and other site perimeter controls to keep construction activities physically removed from any airfield operations in the nearby area, as coordinated with and through LAWA Airfield Operations and the LAWA CALM Team. Therefore, the implementation of the proposed project would not increase hazards due to a design feature or incompatible use. As such, no impact would occur and no further evaluation in the EIR is required.

e. Result in inadequate emergency access?

No Impact. No lane or road closures of public roadways would be required for construction, nor would project construction require closure of any AOA emergency access routes. As such, the proposed project would not result inadequate emergency access. No impact would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. The proposed project would not alter access to or within LAX by public transportation vehicles (e.g., buses) and would not remove sidewalks or other pedestrian facilities within the airport. There are no bicycle facilities (such as bicycle lanes) located on or near the project site; therefore, implementation of the proposed project would not affect bicycle facilities. Implementation of the proposed project is within the boundary of the LAX AOA, which is not accessible to the public, and, as such, would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, no impact would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

XVII. TRIBAL CULTURAL RESOURCES. *Would the project:*

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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:

- **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 §5020.1(k), or**
- **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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Potentially Significant Unless Mitigation Incorporated. There are no known tribal cultural resources, as defined in Public Resources Code Section 21074, on the project site or in the immediate vicinity. The project site is highly disturbed.

A Sacred Lands File (SLF) records search for the project site was commissioned through the California Native American Heritage Commission (NAHC) to determine whether any Native American cultural resources in the NAHC database were located within the project site or within a half-mile radius. An SLF records search is one tool a lead agency can use to determine whether tribal cultural resources may exist within the vicinity of a project. On October 5, 2017, the NAHC indicated that the SLF records search was completed with negative results. The NAHC results also noted, however, that the absence or resource information in the SLF inventory does not preclude the discovery of cultural resources within any project area.[91]

[91] Totton, Gayle, Associate Governmental Program Analyst, State of California Native American Heritage Commission, Letter to Vinita Waskow, Los Angeles World Airports, *RE: Proposed Los Angeles International Airport (LAX) United Airlines (UAL) East Aircraft Maintenance and Hangar/Ground Support Equipment (GSE)*

Assembly Bill 52 (AB 52), approved on September 25, 2014, establishes a new category of resources in CEQA called "tribal cultural resources" that considers tribal cultural values in addition to scientific and archaeological values when determining impacts and mitigation. Further, AB 52 establishes a consultation process between California Native American tribal governments and lead agencies applicable to any project for which a Notice of Preparation, Notice of Intent to Adopt a Mitigated Negative Declaration, or Notice of Intent to Adopt a Negative Declaration is filed on or after July 1, 2015. Section 1 of AB 52 states the legislature's intent as follows:

> "In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of the Legislature, in enacting this act, to accomplish all of the following:
>
> (1) Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
>
> (2) Establish a new category of resources in the California Environmental Quality Act called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
>
> (3) Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
>
> (4) Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Because the California Environmental Quality Act calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources.
>
> (5) In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in the California Environmental Quality Act environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decisionmaking body of the lead agency.
>
> (6) Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to the California

Relocation Project, City of Los Angeles; Venice USGS Quadrangle, Los Angeles County, California, October 5, 2017.

Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).

(7) Ensure that local and tribal governments, public agencies, and project proponents have information available, early in the California Environmental Quality Act environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.

(8) Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.

(9) Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment."[92]

Tribal cultural resources, as defined in Public Resources Code Section 21074, are a site, feature, place, or 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 either:

- 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), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c). In applying the criteria set forth in Public Resource Code Section 5024.1(c) for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

The specific steps and timelines governing the notice and consultation process under AB 52 are as follows:

"1) The Native American Heritage Commission will provide each tribe with a list of all public agencies that may be lead agencies under CEQA within the geographic area with which the tribe is traditionally and culturally affiliated, the contact information of those public agencies, and information on how the Tribe may request consultation. This list must be provided on or before July 1, 2016 (Public Resources Code Section 5097.94(m)).

2) If a tribe wishes to be notified of projects within its traditionally and culturally affiliated area, the tribe must submit a written request to the relevant lead agency (Public Resources Code Section 21080.3.1(b)).

3) Within 14 days of determining that a project application is complete, or to undertake a project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects as described in step 2, above. That notice must include a description of the project, its location, and must state that the tribe has 30 days to request consultation.

[92] State of California, Governor's Office of Planning and Research, *Discussion Draft Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA*, May 2015. Available: https://www.opr.ca.gov/docs/DRAFT_AB_52_Technical_Advisory.pdf.

4) If it wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification described in step 3, above. The tribe's response must designate a lead contact person. If the tribe does not designate a lead contact person, or designates multiple people, the lead agency shall defer to the individual listed on the contact list maintained by the Native American Heritage Commission.

5) The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation.

6) Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (Public Resources Code Section 21080.3.2(b)(1) and (2)). Note that consultation can also be ongoing throughout the CEQA process."[93]

When LAWA initiated preparation of the Notice or Preparation for the proposed project, LAWA had received one written request from a tribe indicating its wish to be notified of projects within its traditionally and culturally affiliated areas, as required by Public Resources Code Section 21080.3.1(b). On October 4, 2017, LAWA sent a project notification letter and map to the tribe. The letter included information such as project location, a brief description of the proposed project, and results of a previous cultural resources assessment in the project area. A response was received on November 6, 2017 from the Native American tribe indicating that no consultation is being requested for the proposed project, but requesting that a Native American monitor be present should any resources be discovered during construction.

Given that there are no known tribal cultural resources at the project site or in the vicinity, the discovery of tribal cultural resources within the project site during construction is unlikely. While discovery of tribal cultural resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could have an impact on previously unknown tribal cultural resources. Thus, impacts on tribal cultural resources from construction would be potentially significant. Operations of the proposed project would not result in any impacts to tribal cultural resources.

As discussed in Section V.b above, LAWA Standard Control Measures LAX-AR-1, Conformance with LAWA's Archaeological Treatment Plan, and LAX-AR-2, Archaeological Resources Construction Personnel Briefing, are proposed as mitigation measures to reduce significant impacts to archaeological resources. These measures would also reduce the potential significant impacts on tribal cultural resources. Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2 require conformance with LAWA's ATP, which contains detailed monitoring procedures and other protocols regarding the treatment of previously unidentified archaeological resources or Native American remains that may be encountered during construction, and briefing by a qualified archaeologist to construction

[93] State of California, Governor's Office of Planning and Research, *Discussion Draft Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA*, May 2015. Available: https://www.opr.ca.gov/docs/DRAFT_AB_52_Technical_Advisory.pdf.

personnel in the identification of archaeological resources and in the correct procedures for notifying the relevant individuals should such a discovery occur. Section 5.2 of LAWA's ATP includes protocols for Native American monitoring in the event of the discovery during construction of an archaeological resource or discovery of Native American remains.[94]

With implementation of Standard Control Measures (Mitigation Measures) LAX-AR-1 and LAX-AR-2, potentially significant impacts to tribal cultural resources would be less than significant and no further evaluation in the EIR is required.

XVIII. UTILITIES AND SERVICE SYSTEMS. *Would the project:*

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. As discussed in Section IX.a, the CWA established the NPDES program to control water pollutant by regulating point sources that discharge pollutants into waters of the United States. Examples of pollutants include, but are not limited to, industrial and municipal waste discharged to water. In California, NPDES permits are also referred to as waste discharge requirements (WDRs). In Los Angeles, the NPDES Program is administered by the LARWQCB. WDRs pertaining to wastewater treatment and discharge apply to municipal and non-municipal parties that operate wastewater treatment plants. These wastewater treatment requirements do not apply to indirect dischargers (such as individual users or projects; 40 CFR §122.3). LAWA does not own or operate a wastewater treatment plant; therefore, the wastewater treatment requirements of the LARWQCB do not directly apply to LAWA or to the proposed project. Sanitary wastewater generated by activities at LAX is treated at the Hyperion Treatment Plant, which is operated by the City of Los Angeles Department of Public Works, Bureau of Sanitation. The potential for the proposed project to result in impacts to the Hyperion Treatment Plant are discussed in Section XVIII.b below. The wastewater treatment requirements of the LARWQCB do not directly apply to the proposed project; therefore, implementation of the proposed project would not exceed wastewater treatment requirements and no further evaluation in the EIR is required.

WDRs pertaining to stormwater are addressed in Section IX.a.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. Sanitary wastewater generated by activities at LAX is treated at the Hyperion Treatment Plant. The City of Los Angeles' Integrated Resources Plan (IRP) identifies the City's plans to accommodate future and cumulative wastewater treatment demand.[95] The City is

[94] City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005. Available: http://www.lawa.org/uploadedFiles/OurLAX/Past_Projects_and_Studies/Past_Publications/Archaeological_Treatment_Plan.pdf.

[95] CH:CDM, A Joint Venture, *City of Los Angeles Integrated Resources Plan, Implementation Strategy*, September 2006. Available:

implementing the components that comprise its plan through the monitoring of triggers (i.e., population growth, regulatory changes, and other policy decisions) as part of their implementation strategy. Similarly, the Los Angeles Department of Water and Power (LADWP) has an adopted the 2015 Urban Water Management Plan that indicates that water supplies in the City will be sufficient to meet projected demands through 2040.[96]

The proposed project improvements would not increase passenger capacity at LAX. Moreover, operation of the proposed project would not increase the number of employees associated with UAL aircraft and GSE maintenance or the long-term employment opportunities at LAX. Therefore, the proposed project would not result in an increase in use of water or generation of wastewater, and would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. Utility connections for the new buildings within the East Maintenance Facility, such as those related to fire water, sanitary sewer, and domestic water systems, would occur through modifications to the utility connections that currently serve existing structures at and near the project site. The project would not result in an exceedance of wastewater treatment requirements of the LARWQCB.

For the reasons stated above, the proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects and no further evaluation in the EIR is required.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. As described in Section IX.a, implementation of the proposed project would not materially increase the amount of impermeable surface areas on the project site, or affect drainage patterns or stormwater drainage systems. Therefore, the proposed project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. No impacts on stormwater drainage facilities would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

No Impact. As noted in Section XVIII.b above, LADWP is the water purveyor for the project site. LADWP is responsible for supplying, treating, and distributing water within the City. According to LADWP, it has met the immediate needs of its customers and is well positioned to

https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010386.pdf.

[96] City of Los Angeles, Department of Water and Power, *2015 Urban Water Management Plan*, June 2016. Available: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmp?_adf.ctrl-state=a7nicm5kh_4&_afrLoop=229203639536444&_afrWindowMode=0&_afrWindowId=12mh9duc7m_14#%40%3F_afrWindowId%3D12mh9duc7m_14%26_afrLoop%3D229203639536444%26_afrWindowMode%3D0%26_adf.ctrl-state%3D12mh9duc7m_42.

continue to do so in the future.[97] As discussed in Section XVIII.b above, the proposed project would not increase employment or passenger capacity at LAX or otherwise notably affect water demand. As such, no new or expanded water supply entitlements would be required. Therefore, no impacts on the City's water supply would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

As discussed in Section 4.3, *LAWA Design and Construction Practices*, the proposed project would be designed to achieve a USGBC's LEED Silver certification, at a minimum. To conserve potable water, the restrooms in the new buildings would be designed with low- or ultra-low-flow systems, and recycled water would be used for construction-related dust control and construction equipment washing when feasible.

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. As discussed in Section XVIII.b above, the proposed project would not increase employment or passenger capacity at LAX or otherwise affect wastewater generation. Implementation of the proposed project would not result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments and no further evaluation in the EIR is required.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

g. Comply with federal, state, and local statutes and regulations related to solid waste?

f-g. No Impact. Demolition of the onsite facilities would result in the generation of approximately 21,000 cubic yards of building material, approximately 25,000 cubic yards of apron material (combination of Portland concrete cement, asphalt concrete, emulsified asphalt treated base, and crushed aggregate), and approximately 8,000 cubic yards of asphalt from the parking lot. During construction, some of the construction debris may be able to be reused on the project site. Construction debris that cannot be reused onsite would be recycled off-site or disposed of at a facility permitted to accept inert solid waste (e.g., concrete and asphalt from construction and demolition activities). Overall, non-hazardous construction and demolition debris generated at the site would be recycled or salvaged to the extent required to meet LEED Silver certification. The total remaining permitted inert (or unclassified landfill) waste capacity in Los Angeles County was estimated to be approximately 56.34 million tons in 2016 (excluding inert debris disposal

[97] City of Los Angeles, Department of Water and Power, *2015 Urban Water Management Plan*, June 2016. Available: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmp?_adf.ctrl-state=a7nicm5kh_4&_afrLoop=229203639536444&_afrWindowMode=0&_afrWindowId=12mh9duc7m_14#%40%3F_afrWindowId%3D12mh9duc7m_14%26_afrLoop%3D229203639536444%26_afrWindowMode%3D0%26_adf.ctrl-state%3D12mh9duc7m_42.

sites).[98,99] Based on the average countywide 2016 disposal rate of 1,183 tons per day (tpd), this capacity would be exhausted in 153 years.[100] Therefore, there is no projected shortfall in disposal capacity for inert waste within Los Angeles County. See Sections VIII.a-b above regarding disposal of hazardous wastes.

Solid waste generated at LAX is disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is a Class III landfill located at 14747 San Fernando Road in Sylmar, California, approximately 35 miles from the project site. Sunshine Canyon Landfill is owned and operated by Republic Services, Inc., and has a maximum permitted throughput of 12,100 tons per day.[101] As of December 31, 2016, this facility had a remaining capacity of 62,083,650 cubic yards, and currently has an estimated closure date of 2037.[102] The waste types accepted at this facility include construction and demolition debris, green materials, industrial, inert, and mixed municipal waste. The proposed project improvements would not increase passenger capacity at LAX. Moreover, operation of the proposed project would not increase the number of employees associated with UAL aircraft and GSE maintenance or the long-term employment opportunities at LAX. Therefore, the proposed project would not result in an increase in the generation or disposal of solid waste. The proposed project would comply with federal, state, and local statutes and regulations related to solid waste, including provisions pertaining to recycling. The proposed project would be designed to provide space to support recycling efforts, including area for depositing, storing, and collecting materials for recycling. No impacts pertaining to solid waste would occur with implementation of the proposed project and no further evaluation of solid waste impacts in the EIR is required.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of 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?

Potentially Significant Impact. As discussed under Section IV above, the proposed project is located in a highly-developed area within the east side of LAX. There are no plant or animal

[98] Inert waste is waste that does not undergo any significant physical, chemical, or biological transformations. Examples of inert waste include construction and demolition debris.

[99] County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017. Available: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

[100] County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017. Available: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

[101] County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017. Available: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

[102] County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017. Available: https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

species listed on any state or federal lists of endangered, threatened or special status species, or riparian/wetland areas, native trees, or wildlife movement corridors at the project site or within the construction staging area. Therefore, the proposed project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal, and no further evaluation in the EIR is required.

There are no known archaeological or paleontological located on the project site, and the disturbed nature of the site makes the site's sensitivity to such resources low. Nonetheless, as discussed under Sections V.b and V.c above, archaeological and paleontological resources have been found at other locations within the airport property, and the potential exists for the destruction of previously unidentified buried archaeological or paleontological resources at the project site during construction, if such resources are present, which would result in a potentially significant impact. With the implementation of the standard control measures identified in Sections V.b and V.c, potential impacts to archaeological and paleontological resources would be mitigated to a level that is less than significant. Therefore, no further evaluation of impacts to archaeological and paleontological resources in the EIR is required.

As described in Section V.a, construction of the proposed project would require the demolition and removal of the existing maintenance hangars on the project site (6000–6016 and 6020–6024 Avion Drive). These buildings are the last remaining grouping of intact buildings of the Intermediate Terminal Facility and the grouping retains sufficient integrity to convey its historic significance and is therefore eligible for listing in the California Register and as a Los Angeles Historic-Cultural Monument.[103] The existing East Maintenance Facility also includes a Quonset Hut, located northwest of Hangar 1. The Quonset Hut is believed to have been placed at the project site by 1950. Due to its historic significance, rarity of building type, and good level of integrity, the Quonset Hut is eligible for listing in the National Register, California Register, and as a City of Los Angeles Historic-Cultural Monument.[104] The proposed project would not demolish or otherwise affect the Quonset Hut. A 15-foot buffer area would be established to ensure that construction activities do not adversely impact the Quonset Hut. Due to the proposed demolition of the Intermediate Terminal Facility buildings, the project EIR will evaluate the potential for the proposed project to eliminate important examples of the major periods of California history, and determine whether the project would cause a substantial adverse change in the significance of a historical resource defined by State CEQA Guidelines Section 15064.5.

[103] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, *(SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20H.pdf.

[104] City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: http://connectinglax.com/files/LAMP_DEIR_Appendix%20H.pdf.

As discussed in Section XVII.a, there are no known tribal cultural resources, as defined in Public Resources Code 21074, on the project site or in the immediate vicinity. An SLF records search was completed by NAHC with negative results. However, these results do not preclude the discovery of tribal cultural resources within the project area. LAWA initiated consultation with the local Native American tribe per AB 52. A response was received on November 6, 2017 from the Native American tribe indicating that no consultation is being requested for the proposed project. While discovery of tribal cultural resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could impact previously unknown tribal cultural resources. Thus, impacts on tribal cultural resources from construction could be potentially significant. Operations of the proposed project would not have the potential to impact tribal cultural resources. With the implementation of LAWA Standard Control Measures LAX-AR-1, Conformance with LAWA's Archaeological Treatment Plan, and LAX-AR-2, Archaeological Resources Construction Personnel Briefing, described in Section V.b, potential impacts to tribal cultural resources would be mitigated to a level that is less than significant. Therefore, no further evaluation of impacts to tribal cultural resources in the EIR is required.

b. Does the project have impacts which are 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).

Potentially Significant Impact. Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."[105] Section 15130(b) of the State CEQA Guidelines sets forth two approaches for analyzing cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- A summary of 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 GHG 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.

To evaluate the proposed project's contribution to cumulative impacts, the first of the two options, commonly referred to as "the list approach," was used to delineate cumulative development. Projects at/adjacent to LAX are listed in **Table 3**, which includes projects on the airport and areas immediately adjacent to the airport, whose development may result in cumulative

[105] 14 California Code of Regulations, Section 15355, *Cumulative Impacts*.

impacts. A description of each project is also provided in Table 3. The projects listed in Table 3 were considered in the cumulative impacts analysis below.

Table 3 Development Projects At/Adjacent to LAX

	Project	Expected Dates	Description
1	South Terminal Improvements	Nov 2011 – Dec 2018	Major interior improvements and building system upgrades within Terminal 7 and Terminal 8.
2	Terminal 1 Improvements	Aug 2014 – Dec 2018	Major interior improvements and building system upgrades to Terminal 1, including addition of floor space and reconfiguration of gates.
3	LAX Midfield Satellite Concourse North Project	Apr 2015 – Mar 2020	The Midfield Satellite Concourse (MSC) North Project consists of a satellite concourse west of TBIT that will include up to 12 aircraft gates that could accommodate ADG V and ADG VI aircraft. The MSC North Project includes associated apron areas, a new crossfield taxiway, a taxilane, and provisions for an underground tunnel.
4	Terminal 1.5	Jun 2017 – Feb 2020	Terminal 1.5 will be constructed between existing Terminal 1 and Terminal 2 to provide additional passenger processing facilities for the north passenger terminals.
5	Terminals 2 and 3 Modernization Project	Sep 2017 – Dec 2023	Improvements to Terminals 2 and 3, consisting of upgrading the Terminal 2 concourse, including construction of additional floor area; the demolition and reconstruction of the Terminal 3 concourse building to provide additional concourse area, including a new operation control center; the demolition of the southern appendages of the Terminal 3 satellite; the demolition and reconstruction of the passenger and baggage processing facilities (ticketing buildings) at Terminals 2 and 3, including new facilities for passenger and baggage screening, ticketing, and baggage claim; and a secure connector between Terminals 2 and 3.
6	Runway 7R-25L Rehabilitation	Sep 2017 – Dec 2018	Reconstruction of runway pavement.
7	MSC South Project	2019 - 2025	The MSC South concourse would be constructed on the south end of the MSC North concourse in order to provide up to 18 additional aircraft gates. The facility would provide approximately 560,000 square feet of floor space.
8	LAX Landside Access Modernization Program[1]	Late 2017 – Dec 2035	Improvements within and east of the CTA to improve access options and the travel experience for passengers; provide a direct connection to the Metro transit system; provide easier and more efficient access to rental cars; relieve congestion in the CTA and on the surrounding street system; and improve the efficiency and operation of the transportation system serving LAX. The program components include an automated people mover (APM) system, Intermodal Transportation Facilities (ITFs), a Consolidated Rental Car Facility (CONRAC), pedestrian walkway connections to the passenger terminals within the CTA, and roadway improvements.

	Project	Expected Dates	Description
NA	Miscellaneous Projects and Improvements	Jan 2014 – July 2020	A wide variety of smaller miscellaneous projects and improvements mostly related to repair/replacement of, and upgrades to, existing facilities at LAX, including, but not limited to, runway repair/rehabilitation; elevators/escalators replacement; CTA second level roadway repairs; terminal taxilanes and aprons rehabilitation; passenger boarding bridge replacements; terminal electrical, plumbing, and facilities upgrades; miscellaneous demolition; and other improvements.
9	Secured Area Access Post (SAAP) Project	2018 - 2020[2]	Construction of a fully functional, secured access point onto the Airport Operations Area (AOA) on the west side of LAX. This will be the sole full-access SAAP on World Way West to replace SAAP 5 which was displaced in January 2016 by the MSC North Project, and SAAP 21, which was taken out of service by Phase 2 of the WAMA Project in May 2017. The proposed location of the new SAAP is parallel to, and south of, World Way West, near where the road will terminate at Coast Guard Road once the MSC North Project is completed.
10	LAX Northside Development	Apr 2016 – Jun 2025	The Northside Development will transform approximately 340 acres of land on the north side of the airport with up to 2,320,000 square feet of development to better serve LAWA and the local communities of Westchester and Playa del Rey. Permitted uses include recreation and open space; office, research, and development; community and civic; commercial; airport support; and landscape buffer.
11	Airport Police Facility[3]	Apr 2018 – Jan 2021	Relocation of LAWA Police Department to consolidate facilities into one location in LAX Northside, which will include the police headquarters, shooting range, canine facility, and parking structure.
12	Receiving Station X [3]	Mar 2019 – Jan 2022	The proposed Receiving Station X (RS-X) would be located in the northwest corner of LAX property, near the intersection of Westchester Parkway and Pershing Drive. The RS-X would address power reliability issues, provide redundancy in the case of power outages, and accommodate the electrical demand of future infrastructure projects at LAX. The new RS-X is envisioned to be a purpose-built structure, designed to accommodate 120 megavolt amperes (MVA) redundant capacity. The proposed RS-X would include the installation of a new receiving station and installation of feeders.
13	LAX Fuel Tank Installation	1st Quarter 2018 –1st Quarter 2019	The LAX Fuel Tank Installation project consists of the addition of four new 60,000 barrel (bbl) gross capacity above ground fuel storage tanks at the existing LAXFUEL leasehold on the west side of LAX. The project includes improvements to add these additional four tanks, including associated site work, piping, and electrical modifications.
14	Argo Drain Sub-Basin Stormwater Infiltration and Treatment Facility[3]	Jun 2018 – Dec 2019	Also referred to as the Westchester Stormwater Best Management Practices Project, this project would develop a 22-acre stormwater infiltration facility north of Westchester Parkway and east of Pershing Drive that would treat both City of Los Angeles and LAWA stormwater flows from the Argo watershed.

	Project	Expected Dates	Description
15	Metro Crenshaw/LAX Transit Corridor Project	Jan 2015 – 2019	The Los Angeles County Metropolitan Transportation Authority (Metro) is constructing the Crenshaw/LAX Transit Corridor Project, which includes an 8.5-mile light-rail transit line that will connect the existing Metro Green Line and the Metro Expo Line at Crenshaw and Exposition Boulevards. As part of this project, a station is being constructed in proximity to LAX near the intersection of Century Boulevard and Aviation Boulevard.
16	Airport Metro Connector 96th Street Transit Station	2020 - 2023	Metro will be constructing a new multi-modal transportation center at 96th Street and Aviation Boulevard to connect LAX to the regional bus and transit system. Components of the Airport Metro Connector (AMC) Station include three at-grade light rail transit (LRT) platforms, bus plaza, bicycle hub, pedestrian plaza, passenger vehicle pick-up and drop-off area and Metro transit center/terminal building ("Metro Hub") to connect passengers between the multiple transportation modes.

Notes:

[1] There are no current proposals or plans regarding what types or amounts of development may occur on the parcels that would be available for other uses as a result of the proposed Landside Access Modernization Program. Further planning, assessment, and other efforts would be needed. Thus, particular uses and development are not reasonably foreseeable at this time.

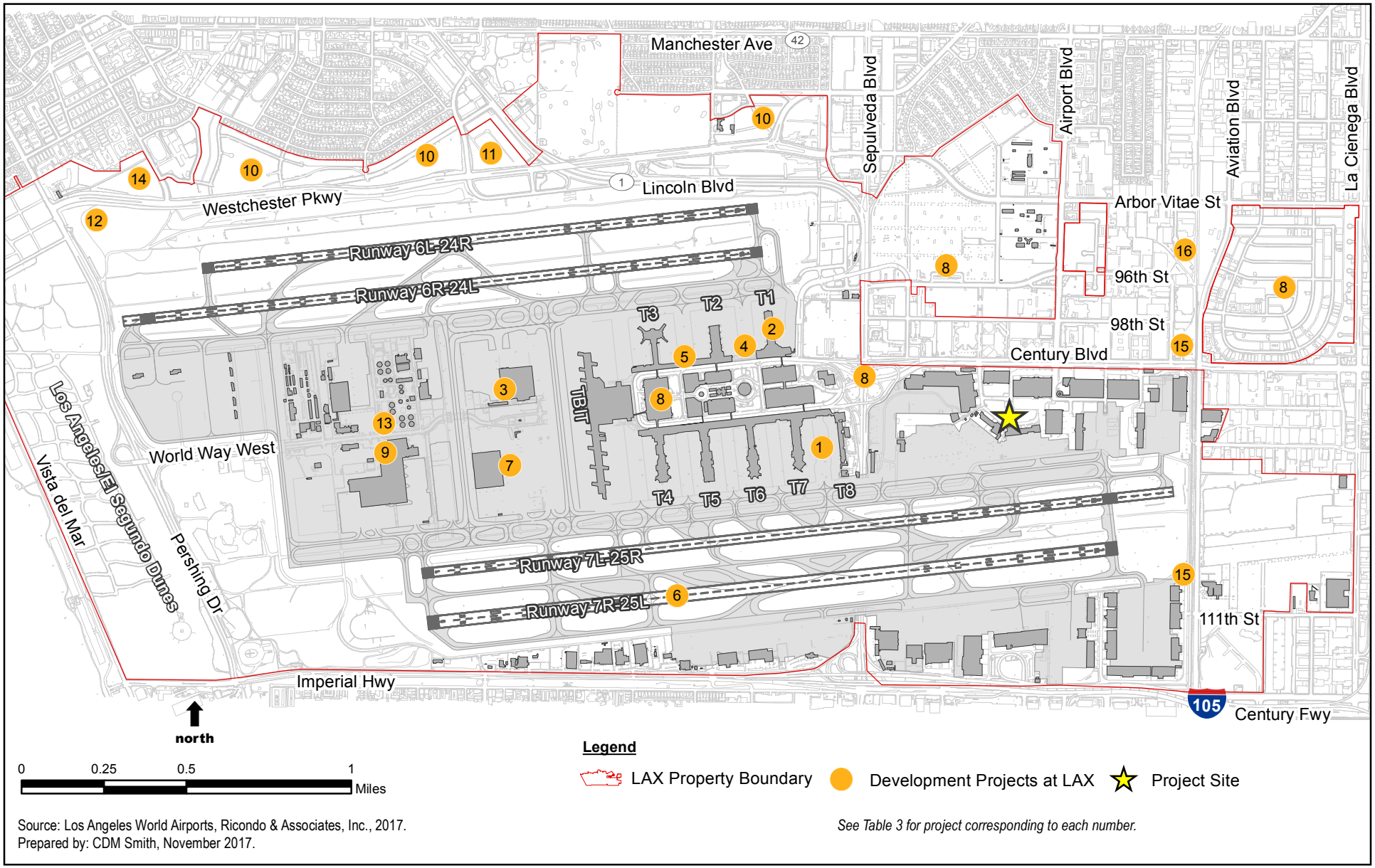
[2] The proposed SAAP project would take approximately 13 months for demolition and construction. Demolition and construction may not be continuous; the 13 months of overall construction activity is estimated to occur in the timeframe between 2018 and 2020.

[3] Project is part of the overall LAX Northside Development.

Sources: LAWA, Ricondo & Associates, Inc., 2017.

Figure 11 illustrates the location of the projects in Table 3 in relationship to the project site. Miscellaneous Projects and Improvements are not on the figure because they occur at multiple locations throughout the airport.

The environmental analyses in the sections above indicates that the proposed project would have no impact on aesthetics, agriculture and forestry resources, biological resources, land use and planning, mineral resources, population and housing, public services, recreation, and utilities and service systems. Therefore, the proposed project would not have the potential to contribute to cumulative impacts for these resources and no further evaluation in the EIR is required.



Source: Los Angeles World Airports, Ricondo & Associates, Inc., 2017.
Prepared by: CDM Smith, November 2017.

See Table 3 for project corresponding to each number.

LAX UAL East Aircraft Maintenance and GSE Project	Cumulative Development Projects At/Adjacent to LAX	Figure **11**

The environmental analyses in the sections above determined that implementation of the proposed project would have less than significant impacts on geology and soils, hazards and hazardous materials, hydrology and water quality, and noise. The proposed project would be located at a distance from sensitive uses and separated by intervening structures, and would result in less than significant impacts to these resources. In addition, the proposed project would comply with state and local requirements and guidelines to minimize or avoid impacts (i.e., LABC and UBC requirements to minimize potential risks and hazards associated with geology and soils; federal, state, local, and LAWA requirements for the use, handling, and disposal of hazardous materials/wastes during construction and operation, as well as coordination by UAL with LARWQCB and LAWA to minimize impacts to ongoing remediation activities onsite; preparation of a SWPPP to address construction-related surface water quality impacts and delineate water quality control measures [i.e., BMPs] and/or LID practices to address impacts). For these reasons, the proposed project would not have the potential to generate cumulatively considerable impacts in combination with the projects listed in Table 3. As such, no further evaluation of cumulative impacts to geology and soils, hazards and hazardous materials, hydrology and water quality, or noise in the EIR is required.

In addition, the environmental analyses above determined that implementation of LAWA Standard Control Measures (Mitigation Measures) LAX-AR-1, LAX-AR-2, LAX-PR-1, and LAX-PR-2 would ensure that any potential impacts to archaeological resources, paleontological resources, and tribal cultural resources from construction of the proposed project would be less than significant. Implementation of these measures would also ensure that the contribution of the proposed project to potentially significant cumulative impacts on archaeological, paleontological, and tribal cultural resources would not be cumulatively considerable and no further evaluation in the EIR is required.

Finally, the environmental analyses above determined that the proposed project would result in potentially significant impacts on air quality, cultural resources (historic resources), GHGs, and transportation/traffic. As such, the EIR will address potential impacts to these resources, including evaluation of potential cumulative effects and the potential of the proposed project to make a cumulatively considerable contribution to cumulative impacts.

c. Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Based on the analysis in this Initial Study, the proposed project would have the potential to result in potentially significant air quality, GHG, and traffic impacts, which could potentially result in substantial adverse effects on human beings. The potential for the proposed project to result in such impacts will be evaluated in the EIR.

Based on the analysis in this Initial Study, the proposed project would not have any environmental effects which could cause substantial adverse effects on human beings, either directly or indirectly, related to aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, tribal cultural resources, and utilities and service systems. Therefore, potential impacts to these resource areas would be less than significant and no further evaluation in the EIR is required.

REFERENCES

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Los Angeles World Airports
One World Way, Room 218
Los Angeles, California 90045

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Appendix A.2 Scoping Meeting Materials

- Scoping Meeting Notice
- Scoping Meeting Boards

Los Angeles World Airports

NOTICE OF PREPARATION/
NOTICE OF PUBLIC SCOPING MEETING

Pursuant to the State of California Public Resources Code Article 7 of the California Environmental Quality Act (CEQA), as amended, the City of Los Angeles, Los Angeles World Airports has prepared an Initial Study for the project described below. Under CEQA, the City finds that the proposed project may have a significant effect on the environment and an environmental impact report will be prepared.

Date: December 7, 2017

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report and Notice of Public Scoping Meeting

Project Name: Los Angeles International Airport (LAX) United Airlines East Aircraft Maintenance and Ground Support Equipment Project

Lead Agency: Los Angeles World Airports

Project Description: The proposed project would consolidate and modernize existing United Airlines (UAL) aircraft maintenance and Ground Support Equipment (GSE) facilities at LAX in light of an upcoming lease expiration for one of the two existing UAL aircraft maintenance areas at LAX. Currently UAL performs maintenance in two areas at LAX: West Maintenance Facility and East Maintenance Facility. The West Maintenance Facility is located in the western portion of LAX, south of World Way West approximately 0.7 mile east of Pershing Drive, and the East Maintenance Facility is located south of Century Boulevard, approximately 0.45 mile east of Sepulveda Boulevard.

UAL's lease of the West Maintenance Facility will expire in 2020. UAL proposes to vacate the western facility and redevelop their existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities in a single site. The proposed project would redevelop an approximately 37-acre site in the eastern portion of the airport operations area with a new aircraft and GSE maintenance facility totaling approximately 411,000 square feet. All the buildings associated with the existing East Maintenance Facility would be demolished, with the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard). The proposed project would not affect the Quonset Hut; the facility would remain in its current location.

Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. With project implementation, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. The consolidation would alter on- and off-airport vehicular movements, as well as aircraft movements on the airfield. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility would instead drive to the East Maintenance Facility. Similarly, on the airfield, GSE and aircraft that currently travel on taxiways and taxilanes to access the West Maintenance Facility would instead travel to the East Maintenance Facility. The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not increase passenger or gate capacity.

Project Location: The project site is located in the eastern portion of LAX at 6000-6016 and 6020-6024 Avion Drive, east of Sepulveda Boulevard and south of Century Boulevard.

Public Scoping Meeting:

As part of the scoping process, a public scoping meeting will be held on:

Tuesday, December 19, 2017
6:00 p.m. to 8:00 p.m.

Flight Path Museum & Learning Center
6661 West Imperial Highway
Los Angeles, California 90045

Los Angeles
World Airports

Environmental Programs Group
Clifton A. Moore Administration Building
One World Way, Room 218
Los Angeles, CA 90045

Public Review: LAWA has prepared a Notice of Preparation/Initial Study (NOP/IS) for the LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project, pursuant to the California Environmental Quality Act (CEQA). The NOP/IS is available for review on the LAWA website www.ourLAX.org, at LAWA's administrative office at One World Way, Room 218, Los Angeles, CA 90045, and at the libraries below:

Westchester-Loyola Village Branch Library
7114 W. Manchester Ave.
Westchester, CA 90045

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

Inglewood Public Library
101 West Manchester Boulevard
Inglewood, CA 90301

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

Public Comments: LAWA welcomes all comments regarding the scope and content of environmental issues to be addressed in the EIR. Written comments must be submitted by **5:00 p.m., Pacific Time, Monday, January 8, 2018.** Comments can be submitted online at www.lawa.org/ourLAX/Comments.aspx or to the following address:

Los Angeles World Airports
Attention: Maritza Lee, Project Planner
One World Way, Post Office Box 92216
Los Angeles, CA 90009-2216

Accommodations: As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities. Alternative formats in large print, braille, audio, and other formats (if possible), will be provided upon request.

Si desea esta información en español, llame a (800) 919-3766.

Los Angeles
World Airports

Welcome to the

Public Scoping Meeting
LAX United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project

Tuesday, December 19, 2017
6:00 pm to 8:00 pm

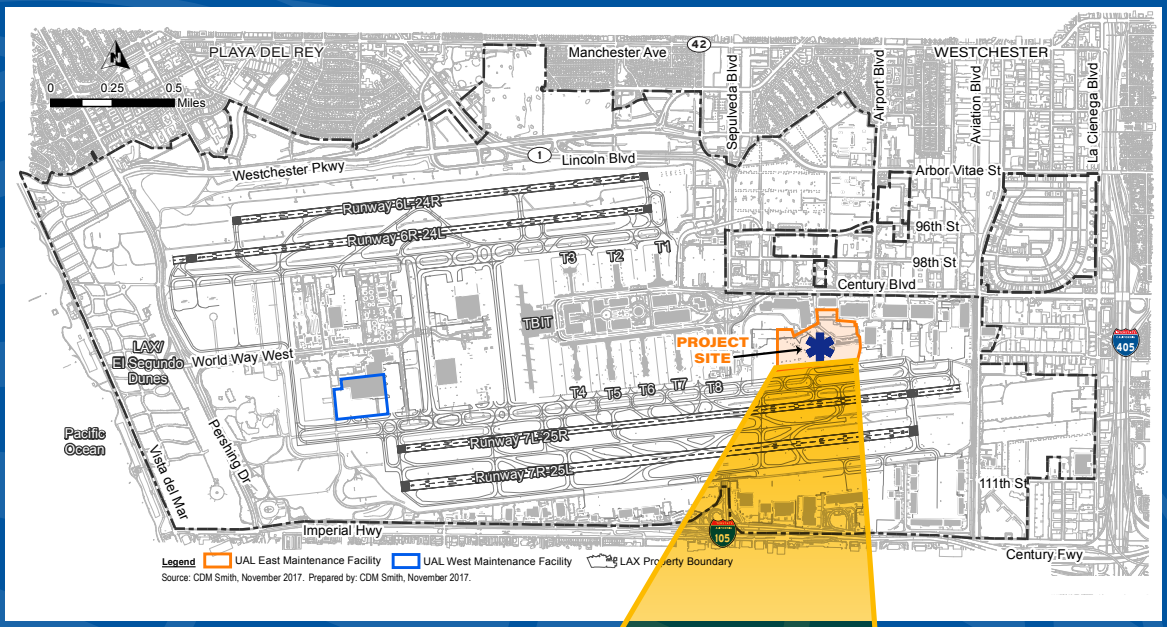
Los Angeles
World Airports

Public Workshop Objectives

- Provide information about the LAX United Airlines East Aircraft Maintenance and GSE Project
- Provide information on the California Environmental Quality Act (CEQA) process
- Discuss Initial Study conclusions and environmental resource areas being carried forward in the Draft EIR
- Collect community comments on the information and analyses presented in the Initial Study

Los Angeles World Airports

Project Site and Purpose

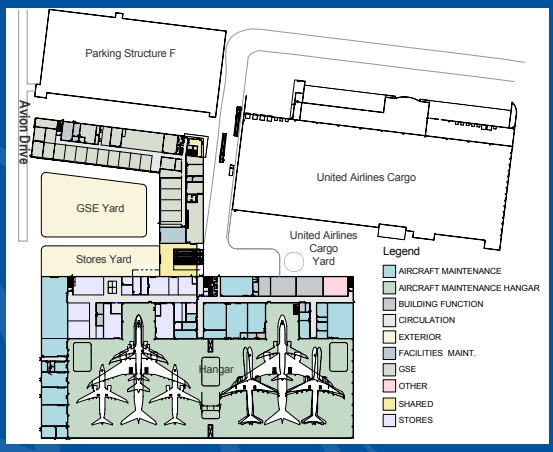


- Consolidate existing UAL aircraft maintenance facilities into one facility on an existing UAL leasehold.
- Modernize UAL's existing East Maintenance Facility.

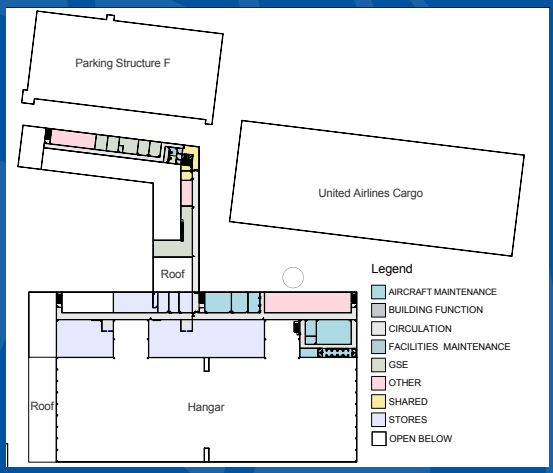
Los Angeles World Airports

Proposed Project Components

- Demolish the existing buildings associated with the East Maintenance Facility
  - Quonset Hut will not be affected
- Construct and operate a new aircraft and GSE maintenance facility, totaling approximately 411,000 square feet to include:
  - Two wide-body aircraft hangar bays and permanent GSE maintenance facility
  - Aircraft maintenance shops, aircraft parts/supplies stores, fire suppression water tank, and supportive facilities
  - The new maintenance building will be designed to meet LEED Silver standards
- Relocate provisioning (i.e., storage) to a portion of the exisiting UAL Cargo building



PROPOSED LEVEL 1 FLOOR PLAN



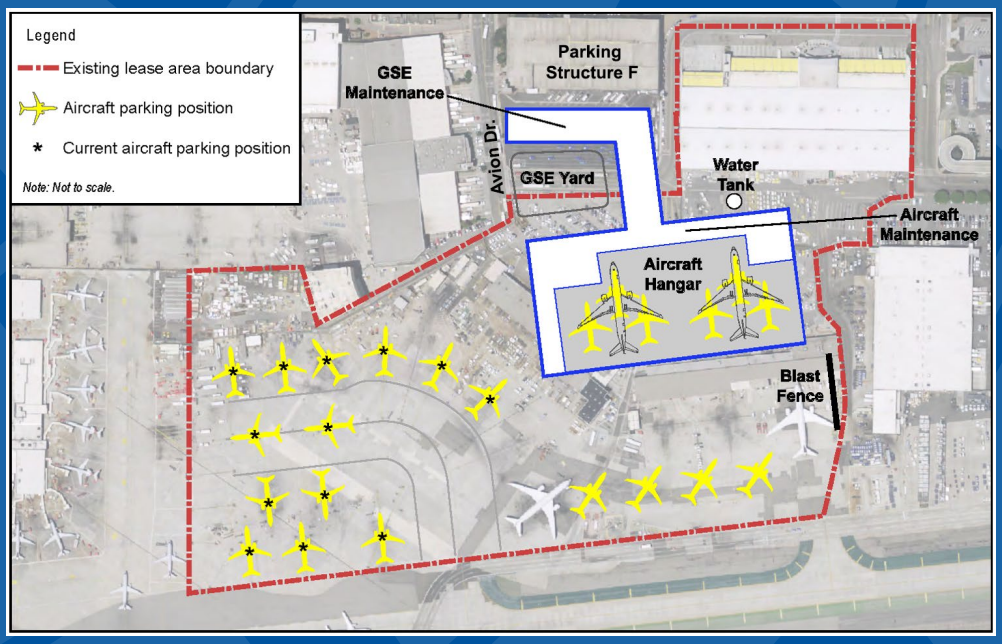
PROPOSED LEVEL 2 FLOOR PLAN

Facility	Existing Facilities		Proposed Facilities	
	Approximate Building Area (ft^2)	Aircraft Parking Positions	Approximate Building Area (ft^2)	Aircraft Parking Positions
West Maintenance Facility	593,046	15	NA	NA
East Maintenance Facility	133,750	19	411,000	23
Total	728,796	34	411,000	23

Los Angeles
World Airports

Proposed Project Components

- Apron improvements
  - Replace/resurface/restripe a portion of the apron area
- Reconfigure the apron and include aircraft parking positions in the hangar
  - Total of 23 future aircraft parking positions on the leasehold
- Construct a jet blast deflector (also called a blast fence)
- Relocate, remove, and install utilities
- Vacate the east-west portion of Avion Drive north of Parking Lot H
- Relocate employee parking to Parking Structure F, located at the southeast corner of Century Boulevard and Avion Drive



CONCEPTUAL SITE PLAN

Los Angeles World Airports

CEQA Overview

- Purpose is to inform decision-makers, agencies, organizations, and the public of the environmental effects of a project
- Applies to discretionary projects
- Identifies potential effects on the environment
- Identifies ways to avoid or reduce potential significant effects through mitigation measures or alternatives

No Impact/Less Than Significant (No Further Analysis)		Analysis Being Carried Forward in EIR

■ Aesthetics
■ Agricultural/Forestry Resources
■ Biological Resources
■ Cultural Resources
  ■ Archaeological Resources
  ■ Paleontological 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
	■ Tribal Cultural Resources
	■ Utilities and Service Systems
		■ Air Quality
		■ Cultural Resources
		  ■ Historical resources
		■ Greenhouse Gas Emissions
		■ Transportation/Traffic
		■ Cumulative Impacts
		■ Other CEQA Considerations

Los Angeles
World Airports

Schedule & Anticipated Milestones

	We Are Here
NOP/Initial Study	**Public Release** **December 7, 2017** **Scoping Meeting** **December 19, 2017**
Draft EIR	**Public Release** **Mid-2nd Quarter 2018**
Final EIR	**Late 3rd Quarter 2018**
Start of Construction	**4th Quarter 2018**

Los Angeles
World Airports

Public Comments on the NOP

Comments can be submitted:

- At this Scoping Meeting on comment cards
- Online at: **http://www.lawa.org/ourLAX/Comments.aspx**
- Mailed to the following contact:

Los Angeles World Airports
Attention: Maritza Lee, Project Planner
One World Way, P.O. Box 92216
Los Angeles, CA 90009-2216

Comments must be received by (not postmarked by)
5:00 pm, Monday, January 8, 2018

A.3 Notice of Preparation Comments

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710

January 3, 2018

Maritza Lee
Los Angeles World Airports
One World Way, Room 218
Los Angeles, CA 90045

Sent via e-mail: mlee3@lawa.org

RE: SCH# 2017121019; Los Angeles International Airport United Airlines East Aircraft Maintenance & Ground Support Equipment Project, City of Los Angeles; Los Angeles County, California

Dear Ms. Lee:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws**.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
   d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
   a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

    This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have been already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714

cc: State Clearinghouse

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Serious Drought.
Making Conservation
a California Way of Life.

January 8, 2017

Ms. Vinita Waskow
City of Los Angeles
Los Angeles World Airports
One World Way, Room 2018
Los Angeles, CA 90045

RE: LAX United Airlines East Maintenance and Ground Support Equipment Project
GTS#07-LA-2017-01254ME-NOP

Dear Ms. Waskow:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project would consolidate and modernize existing United Airlines East aircraft maintenance and Ground Support Equipment facilities at LAX in light of an upcoming lease expiration for one of two existing United Airlines aircraft maintenance areas at LAX, which, in turn would allow for more efficient and effective maintenance of existing aircraft and Ground Support Equipment at the airport.

After reviewing the Notice of Preparation, Caltrans has the following comments:

1. The Environmental Impact Report (EIR) should evaluate whether construction of the proposed project would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the system, taking accounts into all modes of transportation.

2. If this project will implement any of the mitigation measures proposed in the LAWA's Modernization Project, please specify.

If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2017-01254ME

Sincerely,

MIYA EDMONSON
IGR/CEQA Acting Branch Chief

cc: Scott Morgan, State Clearinghouse

From: lsun@aqmd.gov
Sent: Friday, January 5, 2018 7:07:22 AM (UTC-08:00) Pacific Time (US & Canada)
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Submitted - Ref. No. 180105070717

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current submitted form as the file is being updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	180105070717
Date Submitted:	1/5/2018
From:	Lijin Sun
Email:	lsun@aqmd.gov
Company Name:	South Coast AQMD
Address:	
City:	
State:	
Zip Code:	0
Project Name:	United Airlines East Aircraft Maintenance and Ground Support Equipment Project
Other Comments:	

IP Address: 162.80.36.150

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND ONLINE:
www.lawa.org/ourLAX/Comments.aspx
Los Angeles World Airports
Attention: Maritza Lee, Project Planner
One World Way, Post Office Box 92216
Los Angeles, CA 90009-2216

January 5, 2018

Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles International Airport United Airlines East Aircraft Maintenance and Ground Support Equipment Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files[1]. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to

[1] Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance[2] on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

[2] In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook
- SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: http://www.aqmd.gov.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
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January 8, 2018

Via E-Mail and FedEx

Maritza Lee
Los Angeles World Airports
One World Way, P.O. Box 92216
Los Angeles, California 90009-2216

Re: Notice of Preparation for LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project

Dear Ms. Lee:

On behalf of the City of El Segundo, thank you for the opportunity to review the Notice of Preparation and Initial Study for the United Airlines East Aircraft Maintenance and Ground Support Equipment Project ("Project"). El Segundo expects to be actively involved in the planning process and looks forward to follow-up discussions and close coordination as the Project goes forward.

As LAWA is aware, El Segundo has a number of longstanding concerns related to LAX, particularly around noise and traffic impacts originating on the southern airfield and/or directed toward El Segundo. El Segundo appreciates that, for now, the Project appears to be designed to reduce the physical footprint of United's aircraft maintenance and ground service equipment ("GSE") operations (Initial Study at Table 1), and to move existing high-power aircraft engine run-ups farther from the closest receptors in El Segundo (*id.* at 72). Nevertheless, El Segundo believes that the potential transportation, air quality, and climate change impacts identified in the Initial Study could be further minimized, or avoided, if LAWA describes the Project more thoroughly in the Draft Environmental Impact Report ("DEIR"). LAWA should also ensure the Project is consistent with its prior development proposals and decisions, including those encompassed by the LAX Master Plan, Specific Plan, and the ongoing ground run-up enclosure ("GRE") siting and environmental review process.

Project Description. El Segundo is concerned that the DEIR could fail to sufficiently analyze the Project's potential impacts due to an incomplete or inaccurate project description. The Project would expand the existing eastern United aircraft maintenance area lease, due to relocation of activities currently occurring at United's western maintenance area, for which the lease is expiring in 2020. The consolidation would include "redevelopment" of approximately 38 acres/411,000 square feet for a new maintenance facility and additional aircraft parking positions, among other Project elements. The Initial Study states that "[w]hile the basic elements of redeveloping and improving the East Maintenance Facility have been determined, the exact sizes and configuration of those elements are still being evaluated by the project applicant." *Id.* at 8. While it is perhaps understandable that the DEIR would contain a more detailed project description than the Initial Study, LAWA must disclose the full scope of the Project to the public at the earliest opportunity. No uncertainty about the Project's description should persist in the DEIR.

The Initial Study also suggests that LAWA has no plans for the west maintenance lease site after 2020. *Id.* at 1. However, continuation of existing or similar uses is at least reasonably foreseeable because maintenance and aircraft parking facilities already exist. El Segundo has previously expressed concern about expanded aircraft maintenance activities in the vicinity of the western maintenance area. *See* attached West Aircraft Maintenance Area ("WAMA") DEIR comments, Dec. 2, 2013, at 8. The DEIR should state and evaluate the potential future use(s) of the western maintenance area after 2020, and any potential future use of the west maintenance facility site should be consistent with the LAX Master Plan and Specific Plan.[1] Furthermore, the western maintenance area is immediately adjacent to one of four possible locations identified by LAWA for a GRE, one of two GREs required by the 2004 LAX Master Plan. If any future use of the western maintenance site could interfere with the study or environmental review of potential GRE sites, LAWA should disclose this potential. El Segundo has previously asked to be included in the GRE siting, review, and approval process, and reiterates this request here.

The Initial Study also states the Project would not increase the volume of existing maintenance operations. Initial Study at 4. This implies that the Project's operational

[1] The WAMA is located on a site that the Master Plan identifies for employee parking, yet LAWA has not amended the Master Plan to reflect the change in use, against El Segundo's urging. WAMA DEIR comments at 8. Continued use of United's western lease for maintenance operations would concentrate more aircraft maintenance and parking in this part of the airport than the Master Plan allows.

parameters are defined as the "net" maintenance operations after drawdown of the western maintenance area after 2020. *See id.* at Table 1 (stating Project would include 23 aircraft parking spots, compared to the current total of 34 spots at both lease sites). However, the Project as described does not clearly commit LAWA to ceasing maintenance, parking, or other existing operations at the western facility once that lease expires; indeed, it is reasonably foreseeable that the same or similar uses will continue after 2020. Therefore, unless maintenance operations are to be prohibited at the western facility once United vacates, the DEIR must consider the Project's elements, including the new maintenance facility and 10 additional aircraft parking spots,[2] as *additive* to the existing United lease components. These existing components are the physical baseline against which LAWA must evaluate the Project, and LAWA cannot assume without substantial evidence that these components will disappear for purposes of the DEIR's analysis.

Similarly, the Initial Study states that the Project would not increase passenger or gate capacity. *Id.* at 4-5. To justify this conclusion, LAWA must make a clear commitment that the updated lease with United will prohibit passenger loading/unloading at the Project site. Regardless, the DEIR should state what the Project's parking spots will be used for (e.g., active maintenance, remain overnight/remain all day (RON/RAD) aircraft parking, cargo loading/unloading), provide an enforceable commitment that parking spaces will be used only for these purposes, and evaluate the associated airport capacity and environmental impacts.

The Initial Study also states that the Project would alter on- and off-airport vehicle movement, and "aircraft movement" on the ground, due to shifting of employees, equipment, and aircraft from United's western maintenance lease to the Project site. *Id.* at 3, 4, 21. The Initial Study does not describe in any detail the anticipated changes in aircraft movement caused by the Project. The DEIR must include this information as well as an analysis of any potential impacts from the changes in aircraft ground operations caused by the Project.

Noise. The Initial Study states that the Project will include a new blast fence for high-power engine ground run-ups, which presently occur at the western maintenance

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[2] Although Table 1 of the Initial Study suggests the Project would only add 4 parking spots to the eastern maintenance area, Figure 6 indicates that the new maintenance facility could provide an additional 6 narrow-body parking spots, for a total of 10 new parking spots.

facility but not at the eastern facility. *Id.* at 72 (stating that 2-4 high-power run-ups would occur each week, and would comply with the 11pm-6am ground run-up curfew). Although the Initial Study states that conducting ground run-ups at the Project site would move these operations farther away from sensitive receptors in El Segundo (*id.*), LAWA still must accurately evaluate any associated noise impacts, including as part of a single event noise analysis. LAWA should also consider (as a Project alternative or mitigation, for example) whether construction of a GRE is appropriate at the Project site because the new maintenance facility could provide components necessary for, or complementary to, a GRE. Although this location has not been on LAWA's list of sites under consideration for a GRE to date, it is farther from some sensitive residential uses south of the airport than the western GRE locations LAWA is presently considering, and thus potentially preferable to El Segundo.

Parking. During construction, United employees stationed at the east maintenance facility, and some employees who will be bused to the west facility, will be required to use parking lot "H" instead of parking lot "F." *Id.* at 14. During Project construction, parking lot F will also be used by construction workers. *Id.* at 78. The Initial Study does not state the peak number of United employees and construction workers that would need to use parking lot F simultaneously, and whether the parking lot could accommodate this number. The DEIR must include this information. As LAWA is aware, El Segundo has longstanding concerns about LAX's and its contractors' employees improperly parking within El Segundo's limits, and is worried the Project could worsen this problem, both during and after construction.

Traffic. The Initial Study states that United employees that presently use Imperial Highway to access the west maintenance facility will likely use Century Boulevard to access the Project site once the leases are consolidated. Neither Imperial Highway nor other El Segundo roadways are included in the list of Project haul routes. El Segundo appreciates this aspect of the Project and expects it will remain in the DEIR; as always, the City asks that vehicle trips avoid El Segundo when possible. If the potential arises for construction vehicles or employee traffic to use Imperial Highway, Pershing Drive or internal city streets, the DEIR must disclose this information and LAWA should require these vehicles to use El Segundo's designated truck routes.

Thank you for the opportunity to comment on the Project. We request that this firm and the City of El Segundo Planning and Building Safety Department receive a copy of the DEIR.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Joseph "Seph" Petta

EXHIBIT 1

SHUTE, MIHALY
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December 2, 2013

Via E-Mail and FedEx

Lisa Trifiletti
Capital Programming & Planning
Environmental & Land Use Planning
Los Angeles World Airports
One World Way, Suite 218
Los Angeles, CA 90045

Re: Draft Environmental Impact Report for West Aircraft Maintenance Area

Dear Ms. Trifiletti:

We submit this letter on behalf of our client, the City of El Segundo, to comment on the Draft Environmental Impact Report ("DEIR") recently released by Los Angeles World Airports ("LAWA") for the West Aircraft Maintenance Area ("WAMA" or the "Project") at Los Angeles International Airport ("LAX"). As LAWA is aware, El Segundo has been an active participant in the planning process for the Project and expects to be actively involved in further follow-up discussions.

As explained below, the DEIR is legally inadequate under the standards of the California Environmental Quality Act ("CEQA"), Public Resources Code sections 21000 et seq. If revised to provide all of the required evidence and analyses, the DEIR could well determine that the Project will have potentially significant environmental impacts that cannot be avoided through mitigation, particularly noise impacts resulting from increased operations near the airport's border with El Segundo.

The DEIR's inadequacies begin with the fact that the document fails to accurately and completely describe the Project and its operations once constructed. For those aspects of the Project that the DEIR does describe, LAWA assumes operation levels that would result in less-than-significant impacts, but has not committed to maintain those levels through appropriate enforcement and monitoring. Thus, LAWA has not demonstrated that the impacts analysis correlates with the *actual* level of future operations likely at the WAMA.

Second, the Project as described in the DEIR is not consistent with the LAX Master Plan. As you know, the Master Plan was the subject of major litigation and a negotiated settlement, and was intended to serve as the guide for the airport's future development. The Project, however, would occupy land designated in the Master Plan for an entirely different use. As discussed below, this deviation calls into question the purpose of the Master Plan and LAWA's commitment to following it.

Third, the DEIR raises serious questions about the Project's impacts, particularly its noise impacts on El Segundo. The DEIR entirely disregards El Segundo's noise ordinance as a standard of significance in analyzing the Project's noise impacts, and fails to fully account for low-frequency noise impacts from anticipated engine run-ups at the WAMA. Dr. Sanford Fidell's comments ("Fidell Memo") on the DEIR's noise analysis are attached to this letter as Exhibit 1 and incorporated in their entirety herein.

This letter, which incorporates by reference our October 30, 2012 comments on the Notice of Preparation ("NOP"), attached as Exhibit 2, explains these concerns and other shortcomings of the DEIR. El Segundo calls on LAWA to revise the DEIR to evaluate fully the potentially significant impacts of the Project on the City's residents.

I. The DEIR's Description of the Project is Inadequate.

LAWA must describe the Project completely and accurately in the DEIR. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 727.

A. The DEIR Does Not Provide Substantial Evidence to Support Its Assumptions About WAMA Operations.

The DEIR frequently states that the assumptions underlying its analysis are "conservative." To the contrary, the Project description is misleadingly vague and open-ended. LAWA uses arbitrary assumptions about WAMA operations in order to conclude that nearly all of the WAMA's impacts will be less than significant. The assumptions in the DEIR are not supported by substantial evidence, and LAWA has not committed to monitor, maintain, or enforce the operation levels on which its assumptions are based. Without a commitment to monitor, maintain, and enforce operation levels that form the basis of the DEIR's impacts analysis, the analysis lacks credibility and violates CEQA.

Assumed Operation Levels Must Be Actual Levels: Although the DEIR does not clearly indicate who will use the WAMA, it suggests that LAWA will lease certain uses of the WAMA to tenants rather than make the WAMA available to airlines on a "first come, first served" basis. *See, e.g.,* DEIR at 2-10 (hangar to be used by "eventual tenant"). The DEIR must clarify the anticipated use arrangement because it relates directly to the eventual use of the WAMA, including the assumptions about operations that form the basis for the DEIR. If LAWA has identified one or more tenants for the WAMA—such as Qantas and U.S. Airways, whom El Segundo suspects are intended WAMA tenants based on Table 4.5-9 of the DEIR—the DEIR should confirm this and provide information on the tenancies. Indicating that tenants have been identified or confirmed would also provide evidence of a present need for the WAMA, which, as noted below, LAWA has not sufficiently demonstrated.

To guarantee that its assumptions about WAMA operations and the DEIR itself are accurate, LAWA should include operation controls as terms of any leases with future tenants. Such operation controls should include the number of engine run-ups the tenant may conduct per month or year (not to exceed a total of 60 run-ups per year by all tenants combined, as indicated by the DEIR), and the times of day run-ups may be conducted, observing LAWA's existing run-up curfew from 11 p.m. to 6 a.m. *See* LAWA's Aircraft Noise Abatement Operating Procedures and Restrictions at 5-8 through 5-9, attached as Exh. 3. Terms should also include monthly run-up and other maintenance reports by tenants; a commitment by WAMA tenants to use ground power instead of auxiliary power units, except when APUs are being maintained (*see* DEIR at 2-15, indicating RON/RAD spaces will allow full aircraft functionality without running APUs); a commitment by ADG VI carriers not to exceed 80% power during engine run-ups (as indicated by Table 4.5-9 of the DEIR); and a commitment to tow aircraft to and from the WAMA, rather than taxi under aircraft power, as described in the DEIR. *See* DEIR at 4.5-32.

If LAWA cannot ensure that the operation levels it assumes for purposes of the DEIR's impacts analysis will be the *actual* operation levels (or at least reasonably approximate them), then it must revise the DEIR to use "worst case scenario" operation levels for all impacts, including 100%-power engine run-ups by A380 and B-747 aircraft and 100% taxiing to and from the WAMA. *See Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 279, 282 (environmental review must include all of a project's potential impacts); *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 309 (environmental review must consider all activities permitted by project).

Engine Run-ups: The DEIR omits crucial information about the timing and frequency of anticipated engine run-ups during run-up curfew hours. As an initial matter, all information about anticipated levels of operations at the WAMA, especially the kinds of operations that are of greatest concern to neighbors such as El Segundo, should be included in the Project description.

Table 4.5-9 of the DEIR, showing the anticipated number of annual WAMA run-ups by time of day (daytime, evening, and night), indicates that Qantas ADG VI aircraft (A380 and B-747, the largest aircraft at LAX) will not conduct engine run-ups between 7 p.m. and 7 a.m. As these large aircraft are the *only* aircraft anywhere at LAX that, according to the table, will not conduct run-ups during evenings or nights, the DEIR should explain this anomaly, particularly since Table 4.5-11 indicates that A380 and B-747 run-ups at the WAMA may result in noise levels as high as 80 dBA at some locations in El Segundo. Otherwise, the data appears to have been excluded to support a finding of less-than-significant noise impacts.[1]

If, on the other hand, the absence of evening and nighttime run-ups by these aircraft implies a commitment by LAWA to daytime-only ADG VI run-ups—an explanation that would justify using this assumption as the basis for the DEIR's impacts analysis—then the DEIR must explicitly make this commitment part of an enforceable mitigation measure. Any lease with future WAMA tenants, such as Qantas, should include a mandatory run-up schedule with penalties for violations.

Table 4.5-9 also indicates that U.S. Airways will conduct 15.6 annual run-ups between 10 p.m. and 7 p.m. While this time range reflects the CNEL nighttime "penalty" period the DEIR uses to evaluate noise impacts, it conceals whether U.S. Airways run-ups would occur during curfew hours. The table must be revised to indicate when all WAMA run-ups will occur relative to curfew hours.

Finally, it is unclear whether the DEIR's estimate of annual engine run-ups at the WAMA takes into account only "high-power" run-ups, or includes "low-power"

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[1] Similarly, Table 4.5-9 shows that the A380 and B-747 are among the only aircraft at LAX (and the only aircraft anticipated at the WAMA) that will conduct run-ups at 80% power, as opposed to 100%. The DEIR does not explain the reason for the less-than-full power setting. Unless it is an implicit commitment to enforce 80%-power run-ups of ADG VI aircraft at the WAMA—in which case LAWA must be explicit about enforcing this limit—the DEIR should explain why this assumption was used.

run-ups as described on page 2-10 of the DEIR. While high-power run-ups require the use of a blast fence or ground run-up enclosure ("GRE"), low-power run-ups may be performed at or above engine idle and do not necessarily require installed safety devices. *See* DEIR at 2-10. If WAMA operations may include low-power run-ups in the apron area in addition to high-power run-ups at the blast fence, the DEIR must say so and include the potential impacts in its analysis.

Remain Overnight/Remain All Day Spaces: The Project description indicates that the WAMA's RON/RAD spaces would serve as parking areas for aircraft awaiting maintenance "and/or placement at a terminal gate for departure." DEIR at 2-9. If the WAMA's RON/RAD spaces will be used for non-maintenance aircraft parking—despite the fact that the Project Objectives indicate that aircraft maintenance is the *sole* purpose of the WAMA (DEIR at 2-2)—the DEIR must say so. Additional aircraft parking at the WAMA would free up gates that otherwise are occupied by parked aircraft (*see* DEIR at 2-13, indicating parking at CTA "can become crowded during overnight periods"), thereby creating the potential for increased airport operations. The DEIR, however, repeatedly dismisses the possibility of increased airport operations resulting from the Project. The DEIR must provide an enforceable commitment that RON/RAD spaces will be used only for maintenance, or else discuss the potential impacts of increased airport operations resulting from additional aircraft parking at the WAMA.

Additionally, the DEIR suggests that RON/RAD spaces at the WAMA will provide ground power, precluding the need for auxiliary power units. DEIR at 2-15. The DEIR does not discuss the noise, air quality, or other impacts from APUs. Implying that APUs will not be used at the WAMA is not sufficient; the DEIR must clearly state that APU use will be prohibited (except for maintenance of APUs), or else include the noise, air quality, and other impacts of APU usage in the impacts analysis.

Aircraft Movements to and from the WAMA: The DEIR states that 13 morning (a.m.) and 13 afternoon/evening (p.m.) aircraft movements to and from the WAMA are anticipated each day, for a total of 26 movements per day. DEIR at 2-13 through 14. While the DEIR briefly explains the basis for these assumptions, the information is unhelpful in determining the anticipated intensity of operations at the WAMA, given the remaining uncertainty about the approximate number of aircraft and ratio of larger to smaller aircraft at the WAMA at any given time of day.[2] Thus, there is

[2] The DEIR states that the WAMA could accommodate up to ten ADG VI aircraft, a larger number of smaller aircraft, or a mix of aircraft sizes. DEIR at 2-13. The DEIR does not clearly indicate how many smaller aircraft the WAMA could accommodate.

no way to determine whether LAWA's assumptions about aircraft movement are "conservative" or even reasonably reflective of actual use of the WAMA. The DEIR must provide more concrete information about the anticipated ratio of larger to smaller aircraft using the WAMA, and the intensity of use of the WAMA itself on a single day, so that LAWA's aircraft movement assumptions provide a meaningful data point.

Construction Staging: The DEIR states that the Project could displace existing construction staging at the Project site, but that any relocation "would not materially change the general pattern and type of activities that have occurred in these construction staging areas over the past several years." DEIR at 2-15. The DEIR neither indicates *where* existing construction staging may be relocated, nor contemplates the potential impact of relocated staging on the *new* locations. The Project could have significant secondary effects on El Segundo and other airport neighbors if existing construction staging at the Project site is relocated to staging areas immediately adjacent to neighbors' borders, including El Segundo's. The Project description should clearly state where relocation of construction staging may occur, and the DEIR should analyze the potential impacts of this relocation, since these impacts are a reasonably foreseeable aspect of the Project. *See Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396.

B. The Project Description Does Not Demonstrate That the WAMA Will Not Increase Overall Operations at LAX.

LAWA asserts that the Project will not increase overall operations at LAX. *See, e.g.,* DEIR at 2-9. However, the Project description and the rest of the DEIR do not provide substantial evidence to support this assertion.

The DEIR states that all operations that will take place on the WAMA site—maintenance hangars, engine ground run-ups, RON/RAD parking, and ancillary facilities—currently occur elsewhere at LAX and would simply be consolidated at the WAMA. *See* DEIR at 2-9; 4.5-26 through 31. However, as we explained in our comments on the NOP, the DEIR does not fully and clearly account for existing operations so that they can be compared to WAMA operations that will "replace" them. To demonstrate that the WAMA will not increase airport operations, the DEIR must indicate the location, frequency, and intensity of operations that the WAMA will replace—at the very least, with figures similar to Figure 4.5-1 of the DEIR, showing locations of current engine run-ups. Without a "one-to-one" comparison of anticipated WAMA operations and corresponding draw-downs elsewhere, the DEIR lacks substantial evidence that the WAMA will not increase overall airport operations. Clear

documentation is critical to ensure that the maintenance facilities, RON/RAD parking, and other facilities slated for replacement are actually decommissioned and do not continue to be operated following WAMA completion.

Second, while the total Project area is 84 acres, the DEIR indicates that only 68 acres will be developed, leaving 16 acres undeveloped and unpaved. DEIR at 2-9. The DEIR does not explain why these "unpaved islands" (DEIR at 2-9)—which are approximately the same area as the combined footprint of both ADG VI hangars included in the WAMA, and thus could likely be reconfigured to accommodate another hangar or blast fence—will not be developed as part of the proposed Project. Considering the development value to LAWA of each acre of airport land, it is difficult to imagine that LAWA plans to do nothing with these acres; indeed, the DEIR states that these 16 acres will be graded along with the 68 acres to be developed, suggesting preparation for future development. DEIR at 2-16, fn. 4. If LAWA has reasonably foreseeable plans for developing this land, those plans must be included in the DEIR's analysis. Delaying this analysis for another time, when it should instead be conducted as part of the WAMA, may amount to illegal project segmentation under CEQA. *See Bozung*, 13 Cal.3d at 283-84 (CEQA mandates that "environmental considerations do not become submerged by chopping a large project into many little ones").

Third, the DEIR does not explain why the WAMA—a major, $175 million infrastructure project, covering a significant portion of the airport's southwest quadrant—is justified by the added capacity of a mere 60 annual, or 5 monthly, engine run-ups. *See* DEIR at 2-13. If the DEIR is to be believed, the WAMA would accommodate less than 2.5% of the airport's current total run-ups (2,496 per year). *See* DEIR Table 4.5-5. It is difficult to understand why a project that would add so little run-up capacity is so urgently needed, unless LAWA plans to do more with it than the DEIR indicates. We strongly suspect that the actual maintenance, RON/RAD, and other activities at the WAMA will be much greater than the DEIR acknowledges and evaluates. This is a serious CEQA problem.

II. The Project Is Inconsistent With the LAX Master Plan.

The 2004 LAX Master Plan guides and provides a comprehensive look at all development at the airport. LAWA, neighboring jurisdictions like El Segundo, and many other stakeholders spent years developing the Plan, which, according to the settlement resolving litigation over the Plan, is a "general plan for the airport, setting out goals, policies, objectives, and programs for the long-term development and use of the airport." The Master Plan itself states that it contains "working guidelines to be consulted

by LAWA as it formulates and processes future site-specific projects." Master Plan, Preface.

As we explained in our comments on the NOP, the Project is inconsistent with the Master Plan. The Plan sets aside the Project site for use as an employee parking facility (DEIR at 5-23) and locates the new western maintenance facilities on the other side of Taxiway AA, immediately west of the existing United-Continental Hangar (DEIR at 5-9). The Project, however, deviates from the Plan by "exchanging" the proposed uses for these sites and making other changes to the Plan, including expanding the footprint of the proposed development west of Taxiway AA. DEIR at 4.6-10. These inconsistencies are a potentially significant impact under the DEIR's own standard: the proposed Project "conflict[s] with an[] applicable land use plan." DEIR at 4.6-4. The DEIR brushes the conflict aside by claiming that the Project "would not materially change the conceptual framework for development in the Project area . . . [and] would be consistent with the LAX Master Plan Program by providing an aircraft maintenance area in the southwest portion of the airport." DEIR at 4.6-10. This explanation is insufficient—the Project is not what the Master Plan calls for and therefore conflicts with the Plan.

Either the Project must be changed to comply with the Master Plan, or the Plan must be amended to allow the use proposed by the Project. LAWA cannot legally depart from the approved Master Plan in a substantial way without formally amending the Plan and conducting the necessary CEQA analysis. Amending the Plan would be more than a paper exercise because it would help ensure that LAWA follows through with its proposal to turn the area east of Taxiway AA into employee parking, rather than additional maintenance or other unauthorized facilities. The DEIR must describe LAWA's Plan amendment process or similar measure for ensuring that any future development on or near the site of the United-Continental Hangar, American Airlines employee parking, and former Continental training building is for employee parking only.

El Segundo has consistently objected to LAWA's departures from the Master Plan. LAWA's apparent disregard for the Plan is thus deeply troubling. We urge LAWA to re-commit to following the Master Plan as a "general plan for the airport." If changed circumstances suggest deviations from the Plan, LAWA should re-initiate the planning process so that stakeholders can understand and help shape the overall vision for the airport. Making changes in the piecemeal, low-profile manner embodied by the Project, with its incomplete description and inadequate impacts analysis, leaves the public in the dark and causes serious problems in the environmental review process.

III. The DEIR Fails to Account for the Project's Noise Impacts.

The DEIR entirely disregards El Segundo's noise ordinance as a standard of significance in analyzing the Project's noise impacts. *See* City of El Segundo Municipal Code, Title 7, Chapter 2 ("Noise and Vibration"), attached as Exh. 4.[3] El Segundo's standard prohibits the creation of noise levels greater than 5 dB higher than ambient noise levels on residential properties, as well as "loud, unusual, or unnecessary" noise that "disturbs the peace, quiet, and comfort of any neighborhood, or which causes discomfort to any reasonable person of normal sensitivity in the area." Noise Ordinance §§ 7-2-4 through 7-2-6. These are reasonable significance standards for evaluating the Project, which, according to the DEIR, may produce single-event noise levels exceeding 80 dBA at some locations in El Segundo. DEIR Table 4.5-11. Rather than evaluate the impact of these noise levels using El Segundo's standards, however, the DEIR merely states that single-event noise levels "may or may not be perceptible based on the other noise source levels at the community sites." DEIR at 4.5-25. The DEIR is silent about the noise El Segundo residents will *actually* hear from daily WAMA operations, including noise from large aircraft engine run-ups.

By ignoring El Segundo's noise standard and existing ambient noise levels, and relying instead on the FAA's generic "average annual day" standard to assess the Project's noise impacts, the DEIR impermissibly disregards the sensitivity of the community most affected by the Project's noise impacts. *See Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1380-81 (recognizing "significance of an activity may vary with the setting" as basis for CEQA's site-sensitive threshold of significance for noise). Failure to address El Segundo's standard may result in significant underestimation of the Project's audible noise impacts.

Moreover, despite El Segundo's recommendations during the WAMA planning process that LAWA carefully study the Project's low-frequency noise impacts, the DEIR's analysis ignores the secondary impacts of low-frequency airborne noise caused by engine run-ups. *See* Fidell Memo at 1. These secondary impacts manifest as rattling in the interiors of homes and have been shown to cause significant annoyance up to one mile away—farther than the Project's distance from many sensitive receptors in El Segundo. *See* Fidell Memo at 3-4. By relying on A-weighted noise metrics in its

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[3] *See also* City of El Segundo General Plan, Noise Element, Goal N1 (stating the City's objective to ensure that City residents are not exposed to stationary or mobile noise levels in excess of El Segundo's Noise Ordinance standards), attached as Exh. 5.

evaluation of the Project's noise impacts, the DEIR does not account for the unique physics or full spectrum of ground-level, airborne engine run-up noise, whose low-frequency content is more effectively evaluated under a C-weighted analysis. Fidell Memo at 2. The DEIR does not contain a C-weighted noise analysis, even though LAWA is capable of conducting one. *See* Community Noise Roundtable, Recap of Meeting of September 20, 2010, attached as Exh. 6. Consequently, "the magnitude of low frequency sound levels that operations at the WAMA would produce in residences in El Segundo, as well as estimates of the prevalence of annoyance associated with such noise events, are conspicuously absent from the DEIR." Fidell Memo at 2.

In addition to these flaws in the DEIR's noise analysis and the inadequate quantification of engine run-ups discussed in Part I of this letter, El Segundo has the following concerns relating to the Project's noise impacts:

Automated Run-Up Noise Monitoring: The DEIR should include an enforceable mitigation measure requiring rigorous monitoring of the Project's low-frequency noise impacts by including automated run-up noise monitoring on site and regular public reporting. Currently, LAWA does not report any explicit monitoring of run-ups occurring after curfew hours except "enforcement actions," as indicated in the airport's Quarterly Noise Reports. Reporting "enforcement actions" tells the public nothing about the actual occurrence of engine run-ups during curfew hours. Put another way, LAWA does not currently provide the public with data regarding the frequency or occurrence of run-ups during curfew hours. Rather, LAWA only reports that it has not taken enforcement action in response to such run-ups. That could mean no or few such run-ups occur or that LAWA has elected not to enforce the curfew. An automated system at the WAMA should use readily available technology to identify and report run-ups by distinguishing run-up noise from other low-frequency aircraft noise. Ground-level, airborne engine noise has a unique temporal envelope, spectral balance, and event onset and offset times, and a longer duration than other aircraft engine noise. Fidell Memo at 6. Automated monitoring would enable the airport and the public to "obtain the technical information needed to assess whether the [Project] will merely inconvenience the Airport's nearby residents or damn them to a somnabulate-like existence." *Berkeley Keep Jets*, 91 Cal.App.4th at 1382.

Location of Ground Run-Up Enclosures: El Segundo is troubled by the removal, after the publication of the NOP, of the GRE from LAWA's plans for the Project. The Master Plan calls for the development of two GREs. Master Plan Addendum at 2-95. Moreover, the 2010 Stipulated Variance approved by LAWA, El Segundo, and others provides that LAWA will design two GREs by 2015. *See also In the Matter of*

Noise Variance Application for City of Los Angeles et al., Dept. of Transp. Case No. L2010041216 (ordering LAWA to design two GREs). With this deadline rapidly approaching, LAWA must commit to the design and placement of the two GREs. El Segundo recommends that LAWA's "airport-wide GRE siting study" (DEIR at 5-53) commence immediately. The study should conclude before the construction of the WAMA is complete and include serious consideration of the Delta maintenance area and Western Remote Gates as potential GRE sites. As we noted in our comments on the NOP, the GRE planning process should also seek to maximize the degree to which the final GRE structures attenuate/absorb sound through customization of components to meet specifications developed in consultation with El Segundo's noise consultant. The study process should also include evaluation of appropriate GRE use rules/mandates.

IV. LAWA Must Observe El Segundo's Restrictions on Truck Haul Routes.

The Project site currently contains approximately 295,000 cubic yards of accumulated "stockpiled material." DEIR at 2-17. This material will need to be exported off-site for re-use or disposal. *Id.* Haul trucks, in addition to construction trucks for the Project, will enter and exit the Project site approximately 228 times daily during the peak construction month. DEIR at 4.7-20.

As we noted in our comments on the NOP, El Segundo requests that truck trips for the Project avoid the City of El Segundo. If any truck travel through the City occurs, LAWA must ensure that traffic observes the truck haul routes described in El Segundo's General Plan Circulation Element. *See* Circulation Element Exhibit C-13, attached as Exh. 7; *see also* General Plan Circulation Element Excerpts (Goals, Policies, and Objectives), attached as Exh. 8.

Additionally, the DEIR does not evaluate the impact of heavy truck traffic on street pavement conditions. Imperial Highway is already in very poor condition and could be further impacted by Project-related haul truck traffic. The City requests that LAWA include pavement resurfacing on Imperial Highway as a mitigation measure.

V. The DEIR's Consideration of Alternate Sites for the Project is Inadequate.

An EIR must describe a range of alternatives to the proposed project, and its location, that would feasibly attain the project's basic objectives while avoiding or substantially lessening the project's significant impacts. Pub. Res Code § 21100(b)(4); CEQA Guidelines § 15126.6(a). As the California Supreme Court explained in *Laurel Heights*, "[w]ithout meaningful analysis of alternatives in the EIR, neither the courts nor

the public can fulfill their proper roles in the CEQA process." *Laurel Heights*, 47 Cal.3d at 404.

The DEIR fails to justify its rejection of the "West Remote Pads/Gates Site" alternative. In the City's letter commenting on the WAMA NOP, El Segundo recommended that at least some WAMA components, such as a hangar, some RON/RAD spots, and/or a GRE, be built in the Western Remote Gates area. This recommendation was based on the reasonable assumption that LAWA will ensure no net increase in airport operations by decommissioning part, if not all, of the Western Remote Gates. The DEIR, however, ignores the likelihood of decommissioning these gates and rejects the West Remote Pads/Gates Site alternative on the ground that "the site is highly utilized for passenger gate facilities and for aircraft parking (i.e., RON/RAD), including special-purpose use . . . and would not be available for use during the time frame required for development of the proposed Project." DEIR at 5-3. Given that both the WAMA and the Midfield Satellite Concourse Phase I ("MSC North") projects are slated for completion in 2019 (DEIR at 3-6), and the MSC North project will likely require the decommissioning of some Western Remote gates, the DEIR's statement that the Western Remote Gates would not be available as an alternative location during the necessary time frame rings hollow. The DEIR must explain how LAWA will continue operating all of the Western Remote Gates, despite the addition of new gates as part of airport expansion projects elsewhere, such that none of the proposed WAMA operations could be sited at the Western Remote Gates. *See Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1465 (rejecting EIR that included only "barest of facts" regarding alternatives and "vague and unsupported" claims about their merits).

The DEIR's analysis of the "Alternate Site" alternative is also inadequate. The discussion of this alternative does not mention that its location, the Delta maintenance area, is the Master Plan's proposed location for one of the two GREs. Master Plan Addendum at 2-95. The DEIR fails to state that this alternative would enable LAWA to retain the GRE component of the original WAMA design and fulfill part of its obligation to design two GREs by 2015. Moreover, LAWA's disfavor of the Alternate Site alternative's inconsistency with components of the Master Plan, such as the Plan's retention of "approximately 176,000 square feet of existing cargo space" (DEIR at 5-53), is incongruent with LAWA's willingness to depart substantially from other Plan elements for purposes of developing the Project. The Master Plan is a comprehensive blueprint for development at LAX, not an assortment of projects from which LAWA may pick and choose.

Finally, the DEIR's disfavor of the Alternate Site, Reduced Project, and West Remote Pads/Gates Site alternatives for their purported inability to meet the WAMA's maintenance objectives (*see, e.g.,* DEIR at 5-44 and 5-54) is inconsistent with the Master Plan's clear indication of a planned *net reduction* in overall maintenance activities at LAX. *See* Master Plan Addendum at 2-95 (anticipating net reduction of approximately 250,000 square feet of maintenance facilities). This reduction would require relocating some maintenance activities currently occurring at LAX to other airports. Dismissal of these alternatives for their supposed inability to accommodate all maintenance activities anticipated at the WAMA, and the necessity to accommodate some activities at other airports (DEIR at 5-44), ignores the Master Plan's clear policy directive to reduce maintenance activities at LAX.

VI. Conclusion

In sum, LAWA should take no action to adopt any alternative until it has addressed the DEIR deficiencies and Project recommendations discussed in this letter.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Joseph "Seph" Petta

cc: City Council
Greg Carpenter, City Manager
Sam Lee, PBS Director
Kimberly Christensen, AICP, Planning Manager

Exhibits:

1. Fidell Memorandum, Resume, and article by Fidell et al. (2003)
2. Comments of City of El Segundo on WAMA Notice of Preparation, October 30, 2012
3. LAWA Aircraft Noise Abatement Operating Procedures and Restrictions, September 2010
4. El Segundo Municipal Code Chapter 7-2 "Noise and Vibration"
5. General Plan Noise Element Excerpts (Goals, Policies, and Objectives)
6. Recap of September 20, 2010 Meeting of Community Noise Roundtable
7. General Plan Circulation Element Truck Haul Route Map (Exhibit C-13)
8. General Plan Circulation Element Excerpts (Goals, Policies, and Objectives)

546131.2

MERCURY AIR CARGO, INC.

January 8, 2018

Ms. Maritza Lee, Project Planner
LOS ANGELES WORLD AIRPORTS
One World Way
Los Angeles, CA 90009-2216

Via Online & USPS

Re: LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project

Dear Ms. Lee,

Please accept this comment letter under the NOP for the Draft EIR regarding the above referenced project.

Mercury Air Group began operations at LAX in 1956 and Mercury Air Cargo renovated the former Western Airlines maintenance hangar at 6040 Avion Drive in 1995, occupying the new facility in 1997 through to today. The 6040 Avion facility is 241,000 square feet and has 31 dock doors serving 9 international airlines.

On average, over a 24-hour period, this facility handles over 210 trucks carrying air freight ranging from general air cargo, high value air cargo, live animals, human remains, pharmaceuticals and perishables. In 2017, the 6040 Avion facility handled 180,000 tons of air cargo.

Mercury has always been a good airport citizen, supporting LAX's plans for modernization and growth.

As we have communicated to Los Angeles World Airport's deputy executive director, with the addition of two important modifications of approximately 22,000 square feet to increase pedestrian and traffic safety, we would support the above referenced project. Without these minimal improvements, we are concerned not only about safety but maintaining scheduled airfield operations, avoiding massive truck congestion along Avion Drive and stacking of big rigs along Century Blvd close to the Airport entrance and exit ramps.

Please see Exhibit B that details the significant safety and airfield operational issues given the current plan design. The removal of stacking/queuing by closing the Avion connector street and creating a bottleneck dead-end will cause trucks of all sizes—including the often used 53-foot tractor /trailer trucks—to idle/wait along Century Blvd at the entrance and exit ramps of LAX. But worse, once the trucks reach our facility, as the exhibit shows, the turning radiuses in the proposed Avion bottleneck would cause ongoing congestion and potential aircraft departure delays.

To solve these pedestrian and traffic safety issues we have recommended two minor fixes (Exhibit C): a 100-foot-wide truck staging area and a 50-foot-wide truck turn around area. Collectively, these two areas will utilize less than ½ an acre of United's proposed footprint, while dramatically improving public and airfield safety. With the implementation of these or equally equivalent solutions, Mercury supports the United project.

Thank you.

6040 AVION DRIVE, SUITE 200 • LOS ANGELES CALIFORNIA 90045 • (310) 641-5667 • FAX (310) 641-7568

Sincerely,

John E. Peery
COO/EVP
Mercury Air Group/Mercury Air Cargo

Cc: Joseph A. Czyzyk, Chairman & CEO, Mercury Air Group

CSA ARCHITECTS

MERCURY AIR CARGO INC.

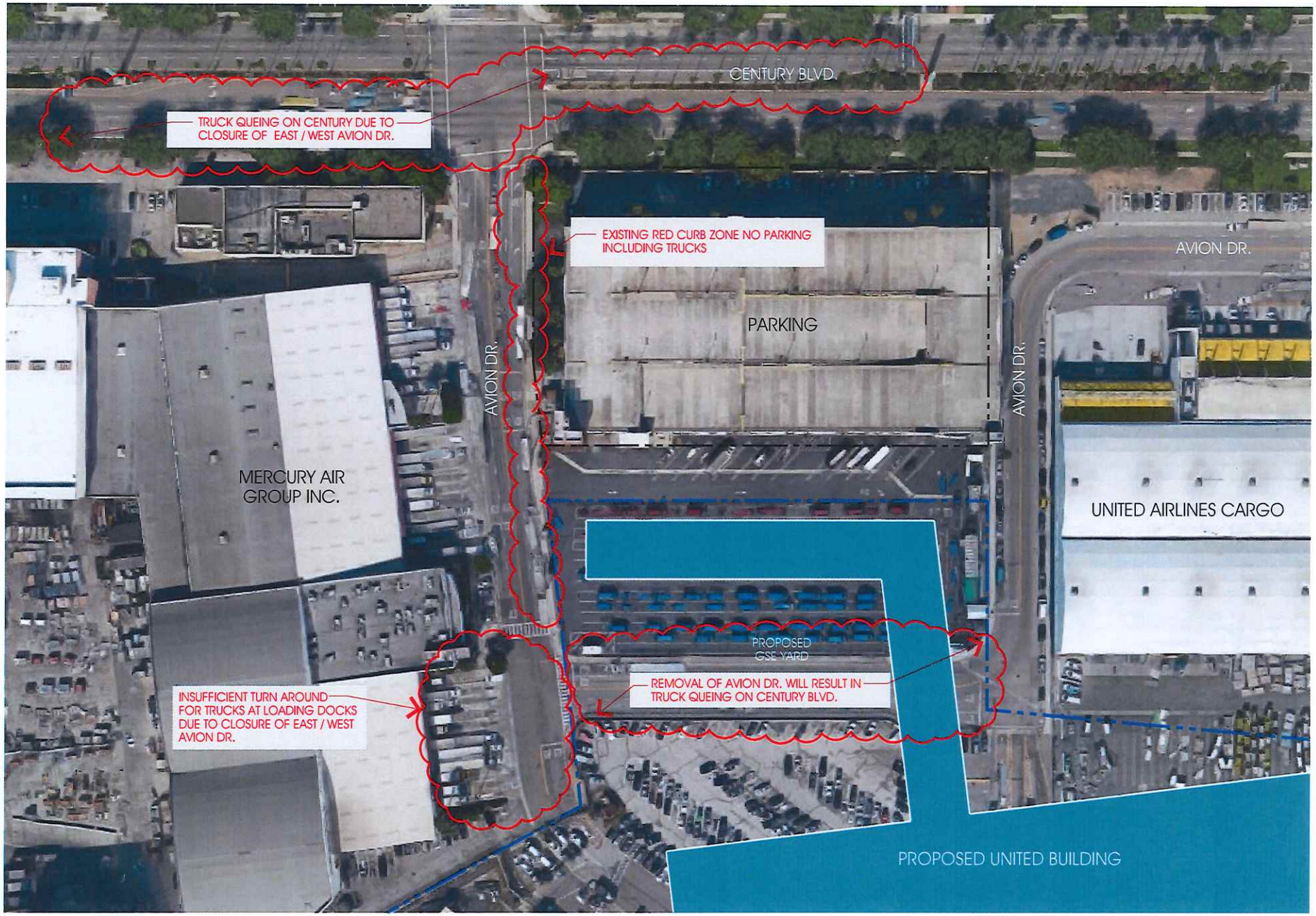
6040 AVION DR., LOS ANGELES, CA 90045

EXHIBIT A

PROPOSED UNITED PROJECT: PROPOSED CONDITIONS

0 100 200 400

4 JANUARY 2018



CSA ARCHITECTS

MERCURY AIR CARGO INC.

6040 AVION DR., LOS ANGELES, CA 90045

EXHIBIT B

PROPOSED UNITED PROJECT: SITE SAFETY IMPACTS

0 30 60 120

4 JANUARY 2018

CSA ARCHITECTS

6040 AVION DR., LOS ANGELES, CA 90045

MERCURY AIR CARGO INC.

EXHIBIT C

AREA "A" = 17,650 SQ. FT. OR 0.405 ACRES
AREA "B" = 4,000 SQ. FT. OR 0.092 ACRES
TOTAL AREA = 21,650 SQ. FT. OR 0.497 ACRES

REVISIONS PROPOSED BY MERCURY

0 50 100 200

4 JANUARY 2018

ARSAC *Alliance for a Regional Solution to Airport Congestion*
7929 Breen Ave. Los Angeles, CA 90045 (physical)
310 641-4199 WWW.RegionalSolution.org info@regionalsolution.org

January 8, 2018

Maritza Lee
Los Angeles World Airports
1 World Way, Room 218
PO Box 92216
Los Angeles, CA
90009-2216

Re: Comments on the LAX United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Facility Notice of Preparation (NOP)

Dear Maritza Lee:

ARSAC, the Alliance for a Regional Solution to Airport Congestion, appreciates the opportunity to comment on this NOP. Founded in 1995, ARSAC is a grassroots, community non-profit organization that educates elected officials and the public on the need to increase utilization of outlying, unconstrained airports such as Ontario and Palmdale to meet Southern California's airport capacity needs instead of expanding LAX. ARSAC supports modernizing, but not expanding LAX, to make LAX safe and secure for the traveling public.

ARSAC thanks LAWA, CDM Smith and United for organizing a conference call last Friday to answer our questions.

First, in general, this project makes sense to consolidate all of the United's maintenance operations into one facility closest to its existing (i.e. Terminals 6, 7 and 8) and future (i.e. Terminal 9) passenger terminal operations. The new East Aircraft Maintenance and GSE facility can help to reduce taxiway congestion on the south LAX airfield which will help to reduce aircraft noise and pollution. ARSAC also appreciates United's commitment to LEED Silver building standards for its new hangar and that United will build a "Pad of the future" with 400 Hz electrical power for all aircraft in the proposed new hangar and on the apron area. For more than a decade, ARSAC has advocated for gate electrification at all passenger gates at LAX as well as ground power connections for all aircraft hangars, cargo ramps and aircraft parking areas. United's project is in line with this electrification goal.

Second, ARSAC remains concerned about three sections in the Initial Study: V. Cultural Resources, XII. Noise and XVI. Transportation/Traffic.

Cultural Resources. While LAWA does not consider the remaining Intermediate Terminal Facility buildings which comprise part of the existing United East Maintenance Area to be eligible for National Historical Monument status, (http://connectinglax.com/files/LAMP_DEIR_Appendix%20H.pdf, page 49, PDF page 53) ARSAC would like LAWA and United to undertake a photo and video survey of the exterior and interior of these buildings. These would be a way to preserve the memory of these buildings. ARSAC suggests that some of the current day photos mirror the view of past photos from when the Intermediate Terminal Facility was in operation. ARSAC also asks if either building can be relocated elsewhere.

Noise. ARSAC remains skeptical of the mathematical noise methodology described on page 72 of the Initial Study for calculating noise from ground run-ups of aircraft (http://www.lawa.org/uploadedFiles/OurLAX/pdf/LAX_UAL_E_Maintenance_Project_Notice_of_Preparation_and_Initial_Study.pdf PDF page 80). Was there an actual noise analysis performed during an engine run-up? Why not? Where else has this mathematical noise model been used? Has it been proven accurate? ARSAC would like a copy of the ground run-up enclosure study completed by LAWA in December 2014. The ground run-up enclosure study should be made public as soon as possible and also be included in the Draft EIR.

The proposed location of the jet blast will be closer to communities (Westchester, El Segundo, Del Aire, Lennox, Inglewood and Hawthorne) potentially exposing new areas with aircraft ground run-up noise. While the Initial Study contends that the number of these events will be low, they are none-the-less noisy Single Event Noise events which can be disturbing to sensitive receptors (i.e. area residents and hotel guests). During certain atmospheric conditions, Westchester / Playa del Rey residents can clearly hear aircraft spooling up engines for taxi and take-off. ARSAC has a recording of an APU running on aircraft near the corner of Century and Aviation. The APU was heard in the Osage neighborhood of Westchester north of that intersection.

While not a part of this United project, ARSAC continues to advocate for a fully-enclosed "hush house" at LAX similar to one in use at Tokyo-Narita Airport (NRT) in Japan. A hush house may provide the most noise relief to surrounding residents when aircraft engine testing is required. A hush house would also not be limited during changes of wind direction. The Draft EIR should address ground run-up enclosures at LAX – current and proposed and the status thereof.

Transportation/Traffic. The project plans to move United employee parking from Parking Lot H to LAWA-owned Parking Structure F. How many parking spaces are being moved from H to F? What is the capacity of Parking Structure F? Will United take-over the entire parking structure as a part of a new lease or will it be available to other users? Will any current users of Parking Structure F be displaced? To where will they be relocated?

Third, we ask LAWA to more strongly consider dates in releasing future NOP's and EIR's for public comments. The NOP was released on December 7, 2017 with a public scoping meeting on December 19, 2017 and comments due on January 8, 2018. These dates are in the middle of the Thanksgiving Day to New Year's Day holiday time frame. LAWA can get better public input on projects when it can avoid significant holidays or conflicting with significant events to solicit this input. We have addressed the NOP/EIR timing issue many times with LAWA.

Please contact us if you have any questions.
Sincerely,

Denny Schneider
President
denny@welivefree.com (213) 675-1817

Robert Acherman
Vice President
robertacherman@aol.com (310) 927-2127

cc: Mike Bonin, LA City Councilmember
Samantha Bricker, LAWA Deputy Executive Director for Planning and Environmental Review

From: aclay@ampcocontracting.com [mailto:aclay@ampcocontracting.com]
Sent: Monday, January 08, 2018 1:28 PM
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Submitted - Ref. No. 180108132745

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current submitted form as the file is being updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	180108132745
Date Submitted:	1/8/2018
From:	Allison Clay
Email:	aclay@ampcocontracting.com
Company Name:	AMPCO Contracting, Inc.
Address:	1540 S. Lewis Street
City:	Anaheim
State:	CA
Zip Code:	92805
Project Name:	United Airlines East Aircraft Maintenance and Ground Support Equipment Project
Other Comments:	I would like to know who are the qualified GCs that are pursuing this project. I have been contacted by AECOM Hunt and would like to submit budgets to all qualified GCs. Thank you in advance for your assistance.

IP Address: 64.31.124.162